TSD File Inventory Index

Date: June 6, 2000

Initial: CMGenevas

Facility Name: American Telephone & Telegraph Operation (Ore [illegible])

Facility Identification Number: OHD 004 282 703

A.1 General Correspondence		**B.2 Permit Docket (B.1.2)**	
A.2 Part A / Interim Status	X	.1 Correspondence	
.1 Correspondence	X	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	X	**C.1 Compliance - (Inspection Reports)**	X
.3 Part A Application and Amendments	X	**C.2 Compliance/Enforcement**	X
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		**C.3 FOIA Exemptions - Non-Releasable Documents**	
A.3 Groundwater Monitoring		**D.1 Corrective Action/Facility Assessment**	X
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure	X	.3 State Prelim. Investigation Memos	
.1 Correspondence	X	.4 RFA Reports	X
.2 Closure/Post Closure Plans, Certificates, etc	X	**D. 2 Corrective Action/Facility Investigation**	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	

Total - 1

.5 RFI QAPP		.6 CMI QAPP	
.6 RFI QAPP Correspondence		.7 Lab Data, Soil-Sampling/Groundwater	
.7 Lab Data, Soil-Sampling/Groundwater		.8 Progress Reports	
.8 RFI Progress Reports		**D.5 Corrective Action/Enforcement**	
.9 Interim Measures Correspondence		.1 Administrative Record 3006(h) Order	
.10 Interim Measures Workplan and Reports		.2 Other Non-AR Documents	
D.3 Corrective Action/Remediation Study		**E. Boilers and Industrial Furnaces (BIF)**	
.1 CMS Correspondence		.1 Correspondence	
.2 Interim Measures		.2 Reports	
.3 CMS Workplan		**F.1 Imagery/Special Studies** (Videos, Photos, Disks, Maps, Blueprints, Drawings, and Other Not Oversized Special Materials.)	
.4 CMS Draft/Final Report		**G.1 Risk Assessment**	
.5 Stabilization		.1 Human/Ecological Assessment ...	
.6 CMS Progress Reports		.2 Compliance and Enforcement ...	
.7 Lab Data, Soil-Sampling/Groundwater		.3 Enforcement Confidential	
D.4 Corrective Action Remediation Implementation		.4 Ecological - Administrative Record	
.1 CMI Correspondence		.5 Permitting	
.2 CMI Workplan		.6 Corrective Action/Remediation Study ...	
.3 CMI Program Reports and Oversight		.7 Corrective Action Remediation Implementation ...	
.4 CMI Draft/Final Reports		.8 Endangered Species Act	
.5 CMI QAPP		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: Documents do not print/zip individual folders/schedules

A.2 Part A/
Interim Status

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

FEB 11 1982

REPLY TO ATTENTION OF:

RCRA ACTIVITIES

Mr. Paul Wergin
Department Chief
Western Electric
6200 East Broad Street D-27350
Columbus, Ohio 43213

RE: Interim Status Acknowledgement USEPA ID No. OHD004282703
FACILITY NAME: Western Electric

Dear Mr. Wergin:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

Please print or type with ELITE type (12 characters/inch) in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-DT

EPA — U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

INSTALLATION'S EPA ID NO.
I. NAME OF INSTALLATION
II. INSTALLATION MAILING ADDRESS
III. LOCATION OF INSTALLATION

OHD-004 282 703 NPO

RECEIVED
JUN 0 2 1986
PLEASE PLACE LABEL IN THIS SPACE
SWD - AIS
U.S. EPA, REGION V

DETACH A

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
F		

I. NAME OF INSTALLATION

AT&T TECHNOLOGIES, INC.

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

3 6200 EAST BROAD STREET D 23240

CITY OR TOWN	ST.	ZIP CODE
4 COLUMBUS	OH	43213

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

5 SAME

CITY OR TOWN	ST.	ZIP CODE
6		

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)	PHONE NO. (area code & no.)
7 Rataiczak, John R. DEPARTMENT CHIEF	614 860-5615

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8 AMERICAN TELEPHONE AND TELEGRAPH

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

- [X] A. GENERATION
- [ ] B. TRANSPORTATION (complete item VII)
- [ ] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only – enter "X" in the appropriate box(es))

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [ ] A. FIRST NOTIFICATION
- [X] B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

OHD004282703

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

OK

I.D. – FOR OFFICIAL USE ONLY

W

D. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F001	2 F002	3 F003	4 F005	5 F006	6 F007
7 F008	8 F009	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

- [X] 1. IGNITABLE (D001)
- [X] 2. CORROSIVE (D002)
- [ ] 3. REACTIVE (D003)
- [ ] 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
✓ P A Klisares	P.A. Klisares Manufacturing Vice-President	5-12-86

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER → OHD004282703 REACKNOWLEDGEMENT

WESTERN ELECTRIC COMPANY INC
6200 EAST BROAD ST D27350
COLUMBUS OH 43213

INSTALLATION ADDRESS →

6200 EAST BROAD ST
COLUMBUS OH 43213

EPA Form 8700-12B (4-80)

09/29/81

Please print or type with ELITE type (12 char. s/inch) in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

EPA U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO. OHD004282703

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE AUG 19 80

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

DETACH

FOR OFFICIAL USE ONLY

COMMENTS:

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
OHD004282703	A	800818

I. NAME OF INSTALLATION

WESTERN ELECTRIC

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 6200 EAST BROAD STREET D-27350

CITY OR TOWN: COLUMBUS | ST.: OH | ZIP CODE: 43213

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: SAME

CITY OR TOWN: | ST.: | ZIP CODE:

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*: WERGIN, PAUL DEPARTMENT CHIEF

PHONE NO. *(area code & no.)*: 614-860-2600 Ext

DETACH

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: AMERICAN TELEPHONE AND TELEGRAPH

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*: M

F = FEDERAL
M = NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify)*:

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.:

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information. AUG 18 1980

EPA Form 8700-12 (6-80)

CONTINUE ON REVERSE

I.D. – FOR OFFICIAL USE ONLY

W | O H D 0 0 4 2 8 2 7 0 3 2 | C

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F 0 0 1	F 0 0 2	F 0 0 3	F 0 0 5	F 0 0 6	F 0 0 7
7	**8**	**9**	**10**	**11**	**12**
F 0 0 8	F 0 0 9	F 0 1 0			

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	**20**	**21**	**22**	**23**	**24**
25	**26**	**27**	**28**	**29**	**30**

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	**38**	**39**	**40**	**41**	**42**
43	**44**	**45**	**46**	**47**	**48**

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

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- [X] 1. IGNITABLE (D001)
- [X] 2. CORROSIVE (D002)
- [ ] 3. REACTIVE (D003)
- [ ] 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
C. G. Vath	C. G. Vath General Manager	AUG 15 1980

EPA Form 8700-12 (6-80) REVERSE

Western Electric

P. A. Klisares
General Manager,
Columbus Works

6200 East Broad Street
Columbus, Ohio 43213
614 860-2345

OHD004282703 9 TSD PA

OCT 29 1982

MR. K. J. KLEPITSCH, JR., Chief
Waste Management Branch
US - Environmental Protection Agency
Region V
P. O. Box A3587
Chicago, Illinois 60604

Dear Mr. Klepitsch:

This letter is to officially notify Region V EPA that the Columbus Works of Western Electric Company, Incorporated will not submit Part B application for a RCRA permit. This facility does not treat or landfill hazardous waste.

When Part A application was submitted in November 1980, the intent was to obtain a permit which would provide for storage of hazardous waste for a period of more than 90 days. Since that time, the Corporation, as well as the Columbus Works, has visited and approved several disposal facilities and recyclers. We are now in a position to have hazardous waste removed on a continuing basis and will not store for more than 90 days.

We have been in contact with Elizabeth Utley, of your office, since early August, concerning the non-filing of Part B application. Per her instructions, we have completed and attached a "Closure Plan", only for our drum storage areas for hazardous waste. This area was listed in Part A application, line 1, page 1 of 5.

Discussions with your office also indicate that three items in Part A application are exempt and are as follows:

Item: (1) Line 2, page 1 of 5. Process code S02 consists of two, 8,000 gallon storage tanks. The material in one tank is new (virgin) and the material in the other tank is used (spent). The spent material is recycled by an outside supplier and returned.

(2) Line 3, page 1 of 5. Process code S03 was filed as a "protective" measure only.

(3) Line 4, page 1 of 5. Process code T01 pertains to our waste water treatment facility, which discharges water to a public owned treatment works.

These three items should be removed from our Part A application. We will revise our original application to reflect these changes. A revised copy will also be sent to the Ohio EPA.

Should you have any questions regarding this letter, please contact Mr. Dale E. Howell, our Environmental Engineer, on (614) 860-5143.

Very truly yours,

Att.

Copy to:
L. J. Adelsberger - Ohio EPA, Central District
P. Cotter - Ohio EPA, Compliance Unit, Central Office
A. G. Foster - Vice President, Manufacturing, Switching Equipment

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

JUL 1 1982

Mr. Paul Wergin
Western Electric Co.
6200 E. Broad Street
D - 42650
Columbus, Ohio 43213

2/

RE: OHD004283703
Western Electric Co.
Columbus, Ohio

Dear Mr. Wergin:

To facilitate the processing of hazardous waste permit applications, we are making two additional requirements concerning the format of these applications:

1. Please uniquely number each page of the application including all attachments (maps, specifications, etc.)

2. If you claim parts of your application as confidential, please provide us with a public information copy of the application. The public information copy must be identical to the full application with the exclusion of the confidential information.

If you have any questions, please call the person indicated in the Part B request letter. Thank you for your cooperation.

Sincerely yours,

Karl J. Klepitsch Jr.

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

FILE

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

MAY 20 1982

REPLY TO ATTENTION OF:
5HW-TUB

Mr. Paul Wergin
Western Electric Co.
6200 E. Broad Street
D-27350
Columbus, Ohio 43213

RE: EPA ID# OHD004283703
Western Electric
Columbus, Ohio 43213

Dear Mr. Wergin:

Recently, we requested you to submit a Part B application for the above-referenced hazardous waste facility under the Resource Conservation and Recovery Act, as amended (RCRA) permit program.

In an attempt to coordinate the review of your application with the Ohio Environmental Protection Agency (OEPA), and striving for a simultaneous issuance or denial of Federal and State hazardous waste facility permits, we urge you to submit three copies of your Part B to OEPA at the same time it is submitted to this Agency. The mailing address for OEPA is:

Ohio Environmental Protection Agency
Division of Hazardous Materials Management
361 East Broad Street Box 1049
Columbus, Ohio 43216

Your direct submittal is necessary to allow OEPA to begin processing under Ohio state law. If you send copies directly to OEPA, you need send only three (rather than four) copies to USEPA.

If you have questions concerning the Ohio permitting process, please contact Mr. Paul Flanigan of OEPA at (614) 462-6303, or Mr. Bob Fragale of the Ohio Hazardous Waste Facility Approval Board at (614) 462-6981. If you have questions concerning the Federal permit process, please contact your permit-writer in this Agency, or Ms. Kathleen Homer, State Implementation Officer for Ohio, at (312) 886-6148.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

cc: Paul Flanigan - OEPA
Bob Fragale - HWFAB

Western Electric

R. S. Kern
Vice President - Finance

222 Broadway
New York, N.Y. 10038
212 669-2427

June 30, 1982

REGIONAL ADMINISTRATOR
Region V
230 South Dearborn St.
Chicago, Illinois 60604

Dear Sir:

I am the chief financial officer of Western Electric Company, Incorporated, 222 Broadway, New York, New York 10038. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure as specified in Subpart H of 40 CFR Parts 264 and 265:

WESTERN ELECTRIC COMPANY, INC.
Columbus Works
6200 East Broad Street
Columbus, Ohio 43213

I.D. #OHD004282703

WESTERN ELECTRIC COMPANY, INC.
Kearny Works
100 Central Avenue
Kearny, New Jersey 07032

I.D. #NJD002139053

The owner or operator identified above owns or operates the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost

estimates covered by the test are shown for each facility:

	CLOSURE COST
WESTERN ELECTRIC COMPANY, INC. Columbus Works 6200 East Broad Street Columbus, Ohio 43213 I.D. #OHD004282703	$60,000.00
WESTERN ELECTRIC COMPANY, INC. Kearny Works 100 Central Avenue Kearny, New Jersey 07032 I.D. #NJD002139053	$70,000.00

The owner or operator identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure and post-closure care of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility:

NONE.

In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this owner or operator is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:

WESTERN ELECTRIC COMPANY, INC.	CLOSURE COST
Dallas Works 3000 Skyline Drive Mesquite, Texas 75149 I.D. #TXD050858182	$ 51,500.00
WESTERN ELECTRIC COMPANY, INC. Hawthorne Works Hawthorne Station Chicago, Illinois 60623 I.D. #ILD074381427	234,000.00

	CLOSURE COST
WESTERN ELECTRIC COMPANY, INC. Oklahoma City Works 7725 W Reno Avenue Oklahoma City, Oklahoma 73125	$ 45,000.00
I.D. #OKD007189111	

The owner or operator identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility:

	CLOSURE COST
WESTERN ELECTRIC COMPANY, INC. Allentown Works 555 Union Blvd. Allentown, PA 18103	$110,000.00
I.D. #PAD002389252	
WESTERN ELECTRIC COMPANY, INC. North Carolina Works 3300 Lexington Road Winston-Salem, NC 27102	100,000.00
I.D. #NCD003213907	
WESTERN ELECTRIC COMPANY, INC. Richmond Works 4500 Laburnum Avenue Richmond, VA 23231	38,500.00
I.D. #VAD000820720	

This owner or operator "is required" to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on December 31. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1981.

I hereby certify that the wording of this letter including the attached Alternative I, items 1 through 19 is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below.

R. S. KERN
Vice President - Finance

Date: June 30, 1982

WESTERN ELECTRIC COMPANY, INCORPORATED
For the Year Ended December 31, 1981
Closure and Post-Closure Care
and Liability Coverage
(Dollars in Millions)

ALTERNATIVE I

1.	Sum of current closure and post-closure cost estimates (total of all cost estimates listed above)	$ .7
2.	Amount of annual aggregate liability coverage to be demonstrated	$ 2.0
3.	Sum of lines 1 and 2	$ 2.7
*4.	Total liabilities (if any portion of your closure or post-closure cost estimates is included in your total liabilities, you may deduct that portion from this line and add that amount to lines 5 and 6)	$ 3,267.7
*5.	Tangible net worth	$ 4,991.2
*6.	Net worth	$ 4,991.2
*7.	Current assets	$ 4,856.9
*8.	Current liabilities	$ 1,855.5
9.	Net working capital (line 7 minus line 8)	$ 3,001.4
*10.	The sum of net income plus depreciation, depletion, and amortization	$ 1,072.3
*11.	Total assets in U.S. (required only if less than 90% of assets are located in the U.S.)	$ Not Applicable

		YES	NO
12.	Is line 5 at least $10 million?	X	
13.	Is line 5 at least 6 times line 3?	X	
14.	Is line 9 at least 6 times line 3?	X	
*15.	Are at least 90% of assets located in the U.S.? If not, complete line 16	X	

WESTERN ELECTRIC COMPANY, INCORPORATED
For the Year Ended December 31, 1981
Closure and Post-Closure Care
and Liability Coverage
(Dollars in Millions)

		Not Applicable	
16.	Is line 11 at least 6 times line 3?		
		YES	NO
17.	Is line 4 divided by line 6 less than 2.0?	X	___
18.	Is line 10 divided by line 4 greater than 0.1?	X	___
19.	Is line 7 divided by line 8 greater than 1.5?	X	___

*The figures included in items 4, 5, 6, 7, 8, 10, 11 and 15 are from the Western Electric Company, Incorporated unconsolidated audited financial statement.

FEB 1 1 1982

EPA/RCRA
P23-6855905

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Paul Wergin
Department Chief
Western Electric
6200 East Broad Street D-27350
Columbus, Ohio 43213

NRV
NUPTA

RE: Western Electric Company
6200 East Broad Street
Columbus, Ohio 43213
OHD004203793
703

Dear Mr. Wergin:

By now you should have received an acknowledgement of our receipt of your Part A permit application material for the above-referenced hazardous waste facility under the Resource Conservation & Recovery Act, as amended (RCRA) permit program. You should also have been apprised of your condition relative to interim status.

Accordingly, this letter constitutes the next step in the formal process leading to issuance or denial of an RCRA permit. Under the authority of 40 CFR 122.22, this is a formal request for submittal of Part B of your application for the above-referenced facility.

Enclosed is a copy of 40 CFR 122.25 which lists the items that constitute Part B for your facility. Your Part B application must be submitted in quadruplicate and postmarked no later than August 18, 1982. Please send your application to the following address:

RCRA ACTIVITIES
Part B Permit Application
USEPA, Region V
P.O. Box A3587
Chicago, Illinois 60690-3587

While your complete application is due no later than the above date, you are encouraged to submit at your earliest opportunity those components which have been completed. Several interim status documents also are used as components of your Part B application. Included are such items as your waste analysis plan, contingency plan, closure plan, etc., each of which may be submitted to this office immediately, to initiate the processing of your Part B application.

Failure to furnish your complete Part B application by the above date, and to provide in full all required information, is grounds for termination of interim status under 40 CFR 122.22.

Information you submit in the Part B application can be disclosed to the public, according to the Freedom of Information Act and U.S.Environmental Protection Agency (USEPA) Freedom of Information regulations. If you wish, however, you may assert a claim of business confidentiality by printing the word "Confidential" on each page of the application which you believe contains confidential business information. USEPA will review business confidentiality claims under regulations at 40 CFR Part 2, and will later request substantiation of any claims. Please review these rules carefully before making a claim.

We have also enclosed a copy of 40 CFR Part 264 which includes technical standards for the operation of treatment and storage facilities. These standards will become applicable upon issuance of a permit to your facility by USEPA.

We will coordinate review of your application with the Ohio Environmental Protection Agency and the Hazardous Waste facility Approval Board, and if your application is acceptable, will strive for a simultaneous issuance of Federal and State hazardous waste facility permits. It is possible that during the processing of your application, the State hazardous waste program may become authorized to issue RCRA permits for your type of facility. In that case, direct Federal processing will cease, and the State in lieu of USEPA will make the final determination on your application.

We are committed to conducting the RCRA permitting process as efficiently as possible. Consequently I suggest you contact Elizabeth Utley of my staff at (312) 886-6162, as you begin preparing your application. Mrs.Utley will be available to discuss specific needs of your application or to meet with you in Chicago. These efforts are intended to generate complete applications, without requiring any information beyond that which is necessary to make RCRA permit decisions.

We look forward to receiving your Part B application.

Sincerely yours,

Original signed by
Karl J. Klepitsch, Jr.

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosures: 40 CFR 122.25
40 CFR 264

cc: A.G. Foster, Vice President
Paul Flanigan, OEPA
Peggy Vince, HWFAB

bcc: Part A File
L. Utley

L. Utley:O.Robinson:5AHWM:WMB:PEU:2/11/82

OHD004282703

KJK 2/11/82

5TU 2
Banaszak
2-12-82

RD 2/12/82

Please print or type in the unshaded areas only (fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

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FORM 1 GENERAL

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

F OHDØØ4282703 3 D

LABEL ITEMS

I. EPA I.D. NUMBER 004282703

III. FACILITY NAME Western Electric

V. FACILITY MAILING ADDRESS 6200 E. Broad St.

VI. FACILITY LOCATION Columbus, Ohio 43213

Western Electric Company, Inc.
6200 East Broad Street
Columbus, Ohio 43213

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill-in area*(s)* below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of **bold-faced terms.**

SPECIFIC QUESTIONS	YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge to waters of the U.S.**? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge to waters of the U.S.**? (FORM 2B)		X	
C. Is this a facility which currently results in **discharges to waters of the U.S.** other than those described in A or B above? (FORM 2C)	X		
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge to waters of the U.S.**? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X		X
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP WESTERN ELECTRIC COMPANY, INCORPORATED

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
2 WERGIN, PAUL C., Dept. Chief	614 866 2000

Edit 9-16-82

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 6200 East Broad Street D27350

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 Columbus	OH	43213

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 6200 East Broad Street

B. COUNTY NAME

FRANKLIN

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
6 COLUMBUS	OH	43213	049

EPA Form 3510-1 (6-80)

NOV 14 1980

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
3661 (specify) (Telephone Switching Equipment) Electronic Components	(specify)
C. THIRD	**D. FOURTH**
(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME

WESTERN ELECTRIC COMPANY, INCORPORATED

B. Is the name listed in Item VIII-A also the owner? [x] YES [ ] NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)

F = FEDERAL
S = STATE
P = PRIVATE
M = PUBLIC (other than federal or state)
O = OTHER (specify)

P (specify)

D. PHONE (area code & no.)

614 868 2660

E. STREET OR P.O. BOX

6200 EAST BROAD STREET, D-27350

F. CITY OR TOWN

COLUMBUS

G. STATE

OH

H. ZIP CODE

43213

IX. INDIAN LAND

Is the facility located on Indian lands? [ ] YES [XX] NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)
9 N OEPA-C406*BD	9 P
B. UIC (Underground Injection of Fluids)	**E. OTHER** (specify)
9 U	9 ATTACHMENT 1 (specify) Ohio EPA Air Permits
C. RCRA (Hazardous Wastes)	**E. OTHER** (specify)
9 R	9 (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements. F9: A/50

XII. NATURE OF BUSINESS (provide a brief description)

Manufacture and assembly of Electro-Mechanical and Electronic Telephone Switching Equipment. Principal Central Office Telephone Equipment Manufactured:
Crossbar Switching Systems
Electronic Switching Systems F9: A/51
Piece Parts
Apparatus
Local Cable and Equipment

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Mr. A. G. Foster Vice President Manufacturing, Switching Equipment	Arthur G. Foster	11/11/80

COMMENTS FOR OFFICIAL USE ONLY

C

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

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FORM 3 RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

S: F 0 H D Ø Ø 4 2 8 2 7 Ø 3 | T/A: 3 | C: 1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

- [X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*
- [ ] 2. NEW FACILITY *(Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

C: 8 | YR.: 5 9 | MO.: 1 Ø | DAY: Ø 1

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR. | MO. | DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

- [ ] 1. FACILITY HAS INTERIM STATUS
- [ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES — CODES AND DESIGN CAPACITIES

A. PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.

1. AMOUNT — Enter the amount.
2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C: DUP | T/A: 3 | C: 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S Ø 2	600	G	
X-2	T Ø 3	20	E	
1	S Ø 1	41,250 ØØØ	G	
2	S Ø 2	16,ØØØ ØØØ	G	
3	S Ø 3	79 ØØØ	Y	
4	T Ø 1	748,800 ØØØ	U	
5				
6				
7				
8				
9				
10				

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T01"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.*

The Industrial Waste Treatment Facility receives chemical waste water from metal finishing operations. Waste streams from metal finishing include dilute acid-alkali, chromium, cyanide-ammonia, concentrated acid, concentrated alkali. The waste water undergoes neutralization, chemical destruction, and clarification by precipitating the metals as hydroxides. Sludge is withdrawn and processed through a hydraulic filter press.

Continuous flow through design is 748,800 GALLONS PER DAY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. **EPA HAZARDOUS WASTE NUMBER** – Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. **ESTIMATED ANNUAL QUANTITY** – For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non-listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. **UNIT OF MEASURE** – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. **PROCESSES**

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

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EPA I.D. NUMBER (enter from page 1): W OHD ØØ4 282 703 T/A 3 C 1

FOR OFFICIAL USE ONLY: W DUP T/A 3 C 2 DUP

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	F Ø Ø 1	260 ØØØ	T	S Ø 1	
2	F Ø Ø 2	15 ØØØ	T	S Ø 1	
3	F Ø Ø 3	1Ø ØØØ	T	S Ø 1	
4	F Ø Ø 5	4 ØØØ	T	S Ø 1	
5	F Ø Ø 6	79 ØØØ	T	S Ø 3	
6	~~F Ø Ø 7~~	~~15 ØØØ~~	~~T~~	~~S Ø 1~~	
7	F Ø Ø 8	7 ØØØ	T	S Ø 1	
8	F Ø Ø 9	1Ø ØØØ	T	S Ø 1	
9	F Ø 1 Ø	1 ØØØ	T	S Ø 1	
10	D Ø Ø 2	8Ø ØØØ	T	S Ø 2	Spent Ammonium Etching Solution that is Recycled.
11	F Ø Ø 7	37Ø,125 ØØØ	T	T Ø 1	Treated Discharge to POTW
12	F Ø Ø 7	15 ØØØ	T	S Ø 1	
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

F | C H D Ø Ø 4 2 8 2 7 Ø 3 | 3 | 6

F6: A/55

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).*

VI. PHOTOGRAPHS

F6: B/56

All existing facilities must include photographs *(aerial or ground–level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).*

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)	LONGITUDE (degrees, minutes, & seconds)
39 57 44Ø	Ø83 ØØ Ø1Ø

VIII. FACILITY OWNER

X A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
E	

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F	G		

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
A. G. FOSTER, Vice President, Manufacturing, Switching Equipment	Arthur G. Foster	11/11/81

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED

OHD004282703

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ATTACHMENT 1

WESTERN ELECTRIC COMPANY, INCORPORATED
6200 East Broad Street
Columbus, Ohio 43213

X. Existing Environmental Permits

Ohio EPA Air Permits to Operate

1 - 0125040257R001
2 - 0125040257R002
3 - 0125040257R003
4 - 0125040257T001
5 - 0125040257P034
6 - 0125040257P040
7 - 0125040257P048
8 - 0125040257P043
9 - 0125040257P046
10 - 0125040257P053
11 - 0125040257P067

Ohio EPA Air Registration Notices

1 - 0125040257B001
2 - 0125040257B002
3 - 0125040257B003
4 - 0125040257B004
5 - 0125040257B005
6 - 0125040257B006
7 - 0125040257P001
8 - 0125040257P002
9 - 0125040257P003
10 - 0125040257P004
11 - 0125040257P006
12 - 0125040257P007
13 - 0125040257P008
14 - 0125040257P009
15 - 0125040257P010
16 - 0125040257P011
17 - 0125040257P012
18 - 0125040257P033
19 - 0125040257P039
20 - 0125040257P041
21 - 0125040257P042
22 - 0125040257P047
23 - 0125040257P049
24 - 0125040257P050
25 - 0125040257P051
26 - 0125040257P052
27 - 0125040257P054
28 - 0125040257P057
29 - 0125040257P058
30 - 0125040257P060
31 - 0125040257P061
32 - 0125040257P063
33 - 0125040257P064

OhioEPA

Re: Franklin County
OHD004282703

April 7, 1981

Mr. Dale Howell
Plant Engineer
Western Electric
6200 East Broad Street
Columbus, Ohio 43213

Dear Mr. Howell:

The Ohio Environmental Protection Agency is cooperating with the U.S. EPA Region V in carrying out the provisions of the Resource Conservation and Recovery Act of 1976 (RCRA), Public Law 94-580. In this effort personnel of the Ohio EPA are conducting inspections of facilities in Ohio that are engaged in the generation, transportation, storage, treatment or disposal of hazardous waste materials.

This letter is to inform you that on March 5, 1981 an inspection of your facility, Western Electric, located in Columbus, Ohio was conducted by Ken Humphrey, Ohio EPA Central District Office and Tim Lawrence, Ohio EPA Hazardous Waste Task Force. Western Electric was represented by yourself. The following areas of concern pertaining to the operation of your facility were noted:

SUBPART B: GENERAL FACILITY STANDARDS

1. The facility does not have a written waste analysis plan as required by Section 265.13(b).

2. All of the entrances to the waste storage areas are not equipped with "Danger-Authorized Personnel Only" signs required under Section 265.14(c). This requirement could be met by fencing in the storage areas located within the main perimeter fence and equipping the fenced in area with the appropriate signs.

3. A written inspection schedule, required by Section 265.15 for active portions of the facility which are subject to RCRA regulation, was not available. Most of the required inspections are actually being performed, but not as a result of a plan written to satisfy the regulatory requirements of Section 265.15.

A copy of this letter and the inspection report will be sent to the U.S. EPA Region V Office in Chicago. Any enforcement action related to this inspection will be initiated by U.S. EPA's Enforcement Division; in that case U.S. EPA will of course contact you. If you have any questions, please contact me (614-466-6450) or Ms. Brenda Lillstrom, (312-353-039B) of the U.S. EPA, Region V.

Sincerely,

K L Humphrey

Kenneth L. Humphrey
Hazardous Waste Scientist
Central District Office

KLH/sc

cc: Union County Health Department
cc: Mr. Don Day, Chief, Ohio EPA, OLPC
cc: Mr. Ernie Neal, Chief, Dhio EPA, OHM
cc: Ms. Brenda Lillstrom, Region V

OhioEPA
State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

George V. Voinovich
Governor

Donald R. Schregardus
Director

April 20, 1993

AT & T
Attn: Dale E. Howell
6200 East Broad Street
Columbus, OH 43213

RE: EPA ID#: *OHD004282703*

LOCATION of INSTALLATION: *6200 E Broad St*
Columbus, OH 43213

In response to your request of February 1993 the following information has been updated:

Name: AT and T
(formerly listed as AT and T Technologies)

Contact: Dale E. Howell

If you have any questions, please contact Beth Barrett at (614)644-2977.

Sincerely,

Thomas E. Crepeau

Thomas E. Crepeau, Manager
Data Management Section
Division of Hazardous Waste Management

TEC/bab

cc: U.S. EPA, Region V
Ohio EPA District Office

OhioEPA
State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

George V. Voinovich
Governor

Donald R. Schregardus
Director

March 27, 1992

AT & T
Attn: A.C. Rauck
6200 E. Broad St.
Columbus, OH 43213-1550

RE: EPA ID#: OHD004282703

In response to your request of March 13, 1992 the following information has been updated:

Contact: A.C. Rauck (614)860-5089

Deleted waste code: F010

Added waste codes: D008, D009

If you have any questions, please contact Beth Harris at (614)644-2977.

Sincerely,

Thomas E. Crepeau

Thomas E. Crepeau, Manager
Data Management Section
Division of Hazardous Waste Management

TEC/bah

cc: U.S. EPA, Region V

Western Electric

C. G. Vath
General Manager
Columbus Works

6200 East Broad Street
Columbus, Ohio 43213
614 868-2345

August 15, 1980

EPA REGION V
RCRA Activities
P.O. Box 7861
Chicago, Illinois 60680

Dear Sir:

Enclosed is the completed EPA Form 8700, Notification of Hazardous Waste Activity.

All information provided is accurate and complete to the best of our ability.

Sincerely,

C G Vath

General Manager

Enc.

AUG 18 1980

AT&T
Network Systems

P. A. Klisares
Manufacturing Vice President

6200 East Broad Street
Columbus, OH 43213-1550
614 860-2345

May 12, 1986

US-EPA; Region V
RCRA Activities
P.O. Box 7861
Chicago, Illinois 60680

Dear Sir:

Attached is an updated EPA Form, Notification of Hazardous Waste Activity. The following changes are noted:

1. Facility Name: AT&T Technologies, Inc.

2. Installation Contact: John R. Rataiczak
   Dept. 23240
   Phone (614) 860-5615

3. Type of Hazardous Waste Activity: A-Generation (only). We do not treat, store or dispose of hazardous waste.

4. Description of Hazardous Waste: Removed F010 from IX Section, part A since we have removed the process that generated this waste.

5. Certification: Name and Title Change
   Mr. P. A. Klisares
   Manufacturing Vice-President

Should you have any questions please contact Dale E. Howell, (614) 860-5143.

Sincerely,

Att.

Copy to:
Lundy Adelsberger - Ohio EPA

1 0 1 2 3 4 5 MILES

MILE SCALE 1:62 500

UNITED STATES DEPARTMENT OF THE INTERIOR GEOLOGICAL SURVEY

TOPOGRAPHIC MAP INFORMATION AND SYMBOLS MARCH 1978

QUADRANGLE MAPS AND SERIES

Quadrangle maps cover four-sided areas bounded by parallels of latitude and meridians of longitude. Quadrangle size is given in minutes or degrees.

Map series are groups of maps that conform to established specifications for size, scale, content, and other elements.

Map scale is the relationship between distance on a map and the corresponding distance on the ground.

Map scale is expressed as a numerical ratio and shown graphically by bar scales marked in feet, miles, and kilometers.

NATIONAL TOPOGRAPHIC MAPS

Series	Scale	1 inch represents	1 centimeter represents	Standard quadrangle size (latitude-longitude)	Quadrangle area (square miles)
7½-minute	1:24,000	2,000 feet	240 meters	7½×7½ min.	49 to 70
7½×15-minute	1:25,000	about 2,083 feet	250 meters	7½×15 min.	98 to 140
Puerto Rico 7½-minute	1:20,000	about 1,667 feet	200 meters	7½×7½ min.	71
15-minute	1:62,500	nearly 1 mile	625 meters	15×15 min.	197 to 282
Alaska 1:63,360	1:63,360	1 mile	nearly 634 meters	15×20 to 36 min.	207 to 281
Intermediate	1:100,000	nearly 1.6 miles	1 kilometer	30×60 min.	1568 to 2240
U. S. 1:250,000	1:250,000	nearly 4 miles	2.5 kilometers	1°×2° or 3°	4,580 to 8,669
U. S. 1:1,000,000	1:1,000,000	nearly 16 miles	10 kilometers	4°×6°	73,734 to 102,759
Antarctica 1:250,000	1:250,000	nearly 4 miles	2.5 kilometers	1°×3° to 15°	4,089 to 8,336
Antarctica 1:500,000	1:500,000	nearly 8 miles	5 kilometers	2°×7½°	28,174 to 30,462

CONTOUR LINES SHOW LAND SHAPES AND ELEVATION

The shape of the land, portrayed by contours, is the distinctive characteristic of topographic maps.

Contours are imaginary lines following the ground surface at a constant elevation above or below sea level.

Contour interval is the elevation difference represented by adjacent contour lines on maps.

Contour intervals depend on ground slope and map scale. Small contour intervals are used for flat areas; larger intervals are used for mountainous terrain.

Supplementary dotted contours, at less than the regular interval, are used in selected flat areas.

Index contours are heavier than others and most have elevation figures.

Relief shading, an overprint giving a three-dimensional impression, is used on selected maps.

Orthophotomaps, which depict terrain and other map features by color-enhanced photographic images, are available for selected areas.

COLORS DISTINGUISH KINDS OF MAP FEATURES

Black is used for manmade or cultural features, such as roads, buildings, names, and boundaries.

Blue is used for water or hydrographic features, such as lakes, rivers, canals, glaciers, and swamps.

Brown is used for relief or hypsographic features—land shapes portrayed by contour lines.

Green is used for woodland cover, with patterns to show scrub, vineyards, or orchards.

Red emphasizes important roads and is used to show public land subdivision lines, land grants, and fence and field lines.

Red tint indicates urban areas, in which only landmark buildings are shown.

Purple is used to show office revision from aerial photographs. The changes are not field checked.

INDEXES SHOW PUBLISHED TOPOGRAPHIC MAPS

Indexes for each State, Puerto Rico and the Virgin Islands of the United States, Guam, American Samoa, and Antarctica show available published maps. Index maps show quadrangle location, name, and survey date. Listed also are special maps and sheets, with prices, map dealers, Federal distribution centers, and map reference libraries, and instructions for ordering maps. Indexes and a booklet describing topographic maps are available free on request.

HOW MAPS CAN BE OBTAINED

Mail orders for maps of areas east of the Mississippi River, including Minnesota, Puerto Rico, the Virgin Islands of the United States, and Antarctica should be addressed to the Branch of Distribution, U. S. Geological Survey, 1200 South Eads Street, Arlington, Virginia 22202. Maps of areas west of the Mississippi River, including Alaska, Hawaii, Louisiana, American Samoa, and Guam should be ordered from the Branch of Distribution, U. S. Geological Survey, Box 25286, Federal Center, Denver, Colorado 80225. A single order combining both eastern and western maps may be placed with either office. Residents of Alaska may order Alaska maps or an index for Alaska from the Distribution Section, U. S. Geological Survey, Federal Building-Box 12, 101 Twelfth Avenue, Fairbanks, Alaska 99701. Order by map name, State, and series. On an order amounting to $300 or more at the list price, a 30-percent discount is allowed. No other discount is applicable. Prepayment is required and must accompany each order. Payment may be made by money order or check payable to the U. S. Geological Survey. Your ZIP code is required.

Sales counters are maintained in the following U. S. Geological Survey offices, where maps of the area may be purchased in person: 1200 South Eads Street, Arlington, Va.; Room 1028, General Services Administration Building, 19th & F Streets NW, Washington, D. C.; 1400 Independence Road, Rolla, Mo.; 345 Middlefield Road, Menlo Park, Calif.; Room 7638, Federal Building, 300 North Los Angeles Street, Los Angeles, Calif.; Room 504, Custom House, 555 Battery Street, San Francisco, Calif.; Building 41, Federal Center, Denver, Colo.; Room 1012, Federal Building, 1961 Stout Street, Denver Colo.; Room 1C45, Federal Building, 1100 Commerce Street, Dallas, Texas; Room 8105, Federal Building, 125 South State Street, Salt Lake City, Utah; Room 1C402, National Center, 12201 Sunrise Valley Drive, Reston, Va.; Room 678, U. S. Court House, West 920 Riverside Avenue, Spokane, Wash.; Room 108, Skyline Building, 508 Second Avenue, Anchorage, Alaska; and Federal Building, 101 Twelfth Avenue, Fairbanks, Alaska.

Commercial dealers sell U. S. Geological Survey maps at their own prices. Names and addresses of dealers are listed in each State index.

INTERIOR—GEOLOGICAL SURVEY, RESTON, VIRGINIA—1978

FOOT SCALE 1:62 500

5000 0 5000 10 000 15 000 20 000 25 000 FEET

MILE SCALE 1:24 000

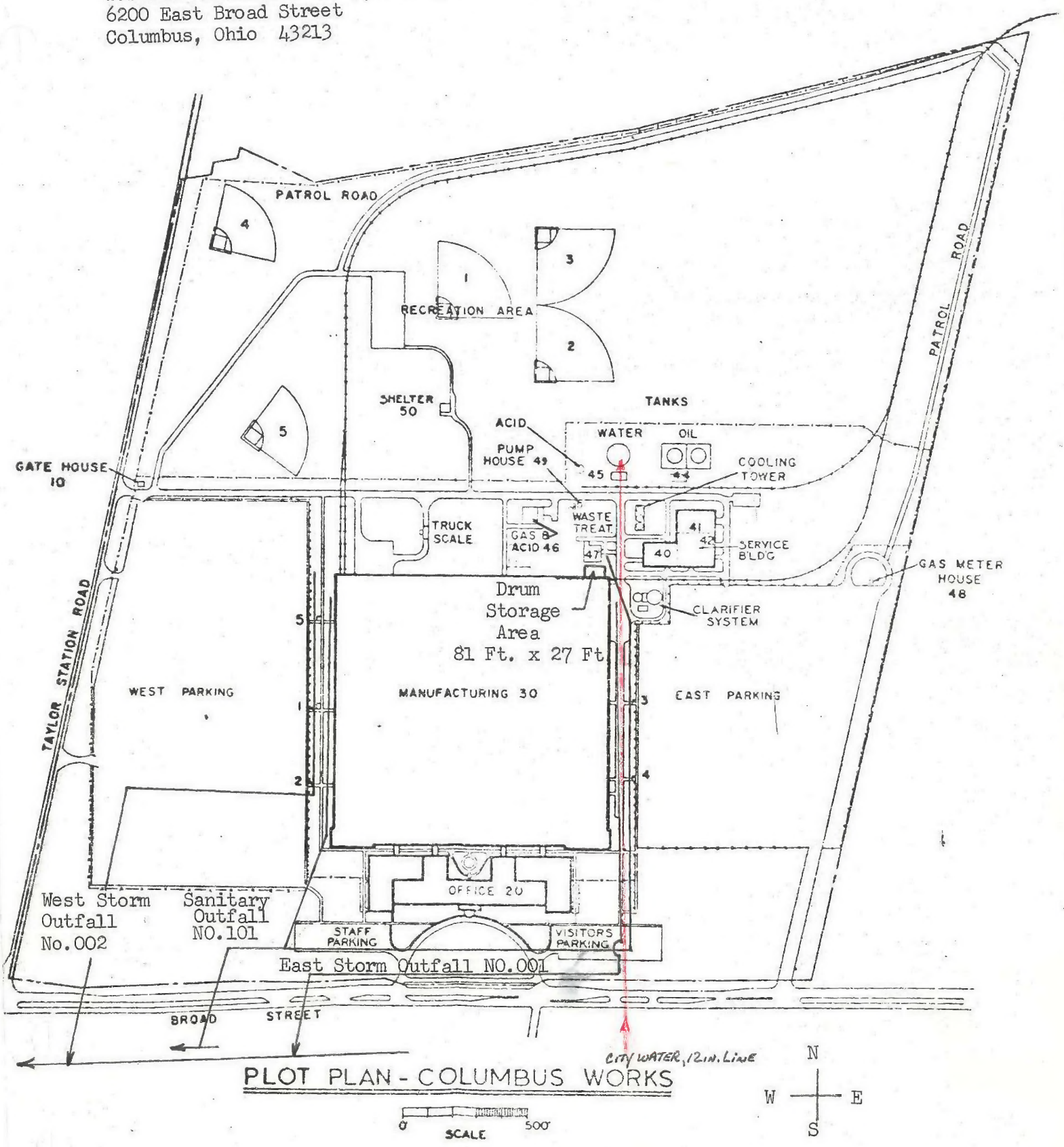
FOOT SCALE 1:24 000

OHD000728733

107

V. Facility Drawing

Western Electric Company, Incorporated
6200 East Broad Street
Columbus, Ohio 43213



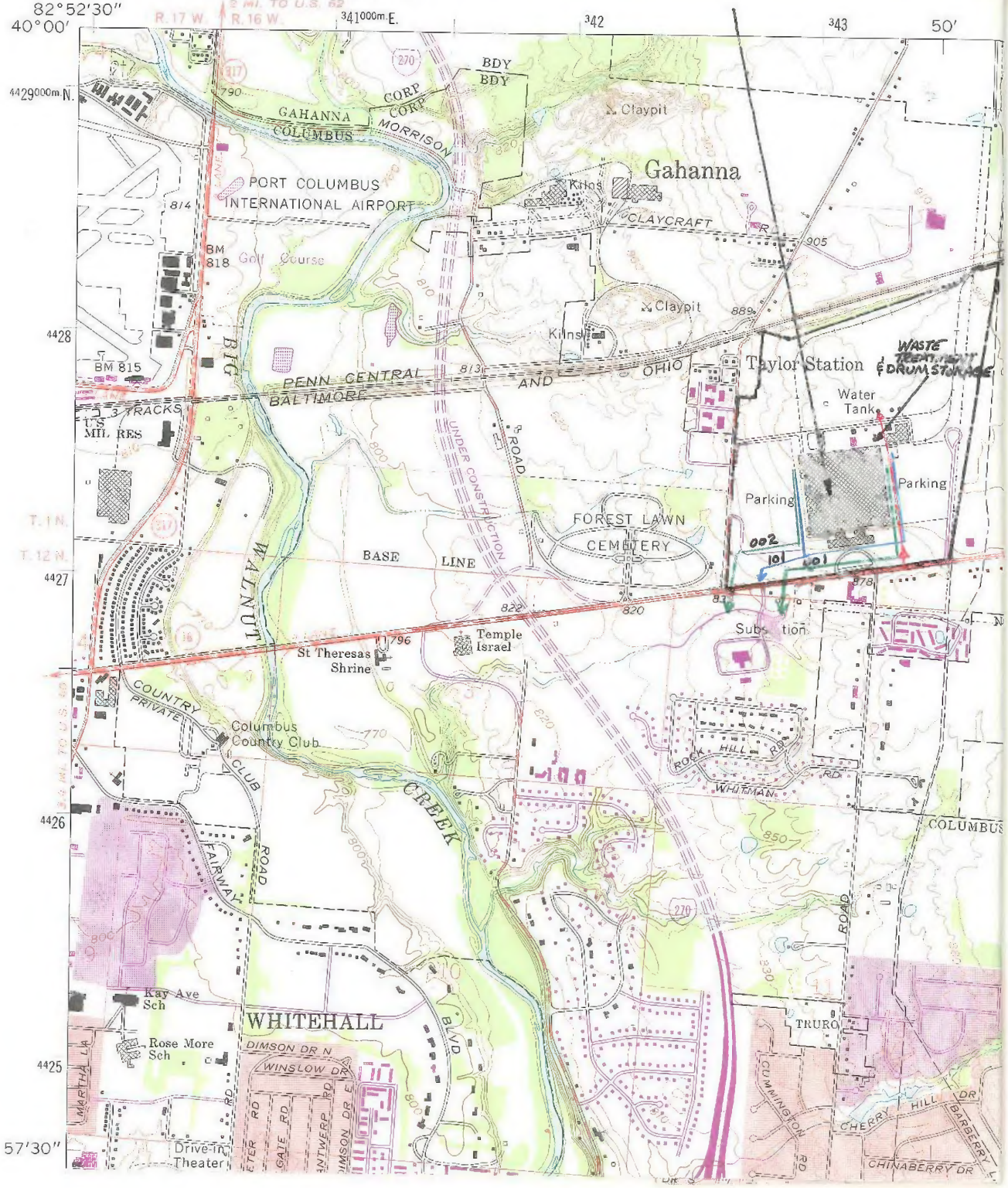
PLOT PLAN - COLUMBUS WORKS

OHD004282703

WESTERN ELECTRIC CO., INCORPORATED
6200 East Broad Street
Columbus, Ohio 43213

4464 III SW
(NORTHEAST
COLUMBUS)

UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY



A.4 Closure/ Post-Closure

5HW-TUB

NOV 23 1982

Mr. P.A. Klisares
General Manager
Columbus Works
Western Electric Company, Incorporated
6200 East Broad Street
Columbus, Ohio 43213

Closed

RE: OHD004282703
Western Electric Co., Inc.
Columbus, Ohio

Dear Mr. Klisares:

This office has received your letter dated October 29, 1982, in which you enclosed a revised Part A application with explanations for the revised exclusions, and also a closure plan and certifications for your drum storage area. Closure was accomplished by off-site disposal of 150 drums of corrosive waste to a secure hazardous waste landfill, and 125 drums of oils and solvents sent to a recycler. All equipment and the storage area was decontaminated, no hazardous wastes will be kept longer than 90 days. This closure and revision does not relieve you of the responsibility to comply with State and local regulations.

Based on the information supplied to us, your facilities will be deleted from our data base, and your status will be that of generator only. The Part B requested will not be required.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

cc: Tom Carlisle, Ohio EPA
Paul Flanigan, Ohio EPA
Dave Howell

bcc: Tom Golz
Part A File

5HW-TUB:LIZ UTLEY:PG:11-22-82

	TYPIST	AUTHOR			SEC. #2 CHIEF	TPS CHIEF	WMB CHIEF	AHMD DIRECTOR
INITIALS	pls							
DATE	11-22-82	11-22-82			Banerdt 11-22-82	11/23/82	11/23/82	

Omr 11/23/82

DG 11/23/82

Burgess & Niple, Limited
Engineers and Architects
5085 Reed Road • Columbus, OH 43220 2581 • (614) 459-2050

b&n 1912

October 8, 1982

SEP 13 REC'D

Mr. Dale E. Howell
Western Electric
Department 42650
6200 East Broad Street
Columbus, OH 43213

Re: Closure Plan Certification

Dear Mr. Howell:

As per Purchase Order No. J 718-643, we have reviewed your "closure plan" and have found it to be in order. We inspected your drum storage areas on October 7, 1982 and found them to be in conformance to the "closure plan". We also found that the storage areas were adequately constructed and well maintained.

Enclosed are two originals and four copies of our "Certification Statement" of the above information.

If you have any comments or questions concerning this matter, or if you desire any additional originals or copies, please do not hesitate to call.

Very truly yours,

Mark R. Rowland

Mark R. Rowland

MRR:cam
Enclosure

CERTIFICATION STATEMENT

Burgess & Niple, Limited, Engineers & Architects, at the request of Western Electric, Columbus Works, has reviewed the closure plan prepared for the two waste material drum storage areas at the plant and found it to be in order. On October 7, 19B2 these two storage areas were inspected.

Area 1 is utilized for the storage, in drums, of chemical residue resulting primarily from electroplating wastes. The drummed chemical residue is removed from the area on a continuing basis for disposal in a secure hazardous waste landfill. On the date of the inspection, there were no stored drums in Area 1. In the future, drums will only be stored for less than 90 days.

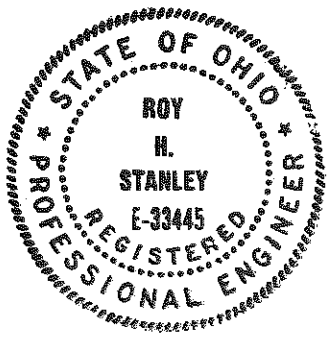
Area 2 is the storage and containment area for drums of spent solvents and oils. These materials are continually removed off site for recycling. There were approximately 40 drums in the area on the inspection date and according to the labels none had been in storage longer than 37 days. As in the case of Area 1, drums will be stored for less than 90 days.

Both Areas 1 and 2 consisted of concrete pads with curbing to prevent run-on and containment. Inspection indicated that the concrete was generally in good condition with no excessive spalling or cracks. It was noted that both areas were completely fenced, well drained, and protected with no through traffic. All drainage within the two areas is directed back into the wastewater treatment plant.

As specified in 40 CFR Part 265 Subpart G (45 FR 33242, May 19, 1980) of the Resource Conservation and Recovery Act of 1976, I certify that the drum storage area has been closed in conformity and accordance with the prepared "closure plan".

Roy H. Stanley

Roy H. Stanley, P.E.
Ohio No. E-033445



ATTACHMENT 1

WESTERN ELECTRIC COMPANY, INCORPORATED

COLUMBUS WORKS

CLOSURE PLAN - (DRUM STORAGE ONLY)

1. Areas involved: (1) Containment area for drums of chemical residue (mainly electroplating waste). This material is disposed of in a secure hazardous waste landfill.

   (2) Containment area for drums of spent solvents and oil. This material is sent to recyclers.

2. When will each area be closed:

   (1) Closure by October 5, 19B2.
   (2) Closure by September 24, 1982.

3. Estimate of waste in storage, at any given time, during life of each area:

   (1) 150 drums
   (2) 125 drums

4. Decontamination of facility equipment during closure:

   Chemical residue pad washed and flushed into waste treatment facility for treatment.

5. Date of final closure: October 5, 1982

6. Disposal or decontamination of equipment: None Required

7. Estimate of Closure Cost: $12,000.DO

Western Electric

P. A. Klisares
General Manager,
Columbus Works

6200 East Broad Street
Columbus, Ohio 43213
614 860-2345

OCT 29 1982

MR. K. J. KLEPITSCH JR.
Chief, Waste Management Branch
US-Environmental Protection Agency
Region V
P. O. Box A3587
Chicago, Illinois 60604

Dear Mr. Klepitsch:

The Columbus Works is submitting a closure plan for drum storage areas. These areas have been closed per plan details, inspected by our Engineers and certified by an independent professional engineer.

I hereby certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in this document, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Very truly yours,

P A Klisares

OCT 29 1982

Att.

Western Electric

Morton I. Zeidman
Attorney

222 Broadway
New York, N.Y. 10038
212 669-2510

June 30, 1982

Dear Sir:

Enclosed is the documentation necessary to establish financial responsibility pursuant to the requirement of 40 CFR, Subpart H, Parts 264 and 265. If additional information or clarification is required, please contact the undersigned.

Very truly yours,

Morton I. Zeidman

/dl

Enc.

ARTHUR YOUNG

ARTHUR YOUNG & COMPANY
277 PARK AVENUE
NEW YORK, NEW YORK 10172

The Board of Directors
Western Electric Company, Incorporated

We have examined the accompanying balance sheets of Western Electric Company, Incorporated at December 31, 1981 and 1980, and the related statements of income and retained earnings and changes in financial position for the years then ended. Our examinations were made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

In our opinion, the statements mentioned above present fairly the financial position of Western Electric Company, Incorporated at December 31, 1981 and 1980, and the results of operations and changes in financial position for the years then ended, in conformity with generally accepted accounting principles applied on a consistent basis during the period.

Arthur Young & Company

February 5, 1982

WESTERN ELECTRIC COMPANY, INCORPORATED

STATEMENTS OF INCOME AND RETAINED EARNINGS

	(Dollars in millions) Year ended December 31	
	1981	1980
GROSS INCOME:		
Sales		
Bell Telephone Companies	$12,109.4	$11,282.4
United States Government	286.7	214.7
Other Customers (including Subsidiaries and Bell Telephone Laboratories, Incorporated)	356.4	281.8
Total Sales	12,752.5	11,778.9
Other Income	77.1	101.8
Total Gross Income	12,829.6	11,880.7
COSTS AND EXPENSES:		
Cost of Products and Services	9,345.8	8,702.6
Development Expense (b)	995.5	756.3
Merchandising and General Expenses	1,001.8	985.1
Interest Expense (c)	186.8	159.3
Total Costs and Expenses (d)	11,529.9	10,603.3
Income Before Income Taxes	1,299.7	1,277.4
Provisions for Income Taxes (e)	588.4	584.2
NET INCOME	711.3	693.2
Add Retained Earnings at Beginning of Year	2,500.2	2,277.0
Deduct Dividends	525.0	470.0
RETAINED EARNINGS AT END OF YEAR	$ 2,686.5	$ 2,500.2

See accompanying notes.

WESTERN ELECTRIC COMPANY, INCORPORATED

BALANCE SHEETS

ASSETS	(Dollars in millions) December 31 1981	1980
CURRENT ASSETS		
Cash and Temporary Investments - Less drafts outstanding: 1981, $117.2 million; 1980, $107.0 million (f)	$ 30.8	$ 31.1
Receivables:		
Bell Telephone Companies	1,434.5	1,318.7
United States Government	55.8	42.1
Other (including Subsidiaries and Bell Telephone Laboratories, Incorporated)	287.7	206.5
Total Receivables	1,778.0	1,567.3
Inventories (g)	3,048.1	3,253.5
Total Current Assets	4,856.9	4,851.9
INVESTMENTS (a)		
Subsidiary and Joint Venture Companies at Equity Value	356.2	349.1
Bell Telephone Laboratories, Incorporated	347.0	271.0
Other Investments (principally at cost)	1.5	1.6
Total Investments	704.7	621.7
PLANT AND EQUIPMENT (h)	4,374.0	3,958.4
Less Accumulated Depreciation and Amortization	1,689.1	1,492.6
Net Plant and Equipment	2,684.9	2,465.8
DEFERRED CHARGES	12.4	13.9
	$8,258.9	$7,953.3

LIABILITIES AND EQUITY CAPITAL	(Dollars in millions) December 31 1981	1980
CURRENT LIABILITIES		
Payable to Suppliers and Employees and Other Accruals (including Subsidiaries and Bell Telephone Laboratories, Incorporated)	$ 972.8	$ 953.9
Federal, State and Local Taxes Payable	127.5	105.1
Deferred Income Taxes	80.0	80.2
Short-term Debt (i)	675.2	981.7
Total Current Liabilities	1,855.5	2,120.9
DEFERRED INCOME TAXES	399.9	372.4
UNAMORTIZED INVESTMENT TAX CREDITS	194.7	167.5
ACCUMULATED PROVISIONS		
Force Adjustments	7.5	23.7
Plant Reconversion	3.0	3.0
Total Accumulated Provisions	10.5	26.7
LONG-TERM DEBT (j)	807.1	816.5
EQUITY CAPITAL		
Common Shares - No par value; authorized 100 shares; outstanding one share (k)	2,304.7	1,949.1
Retained Earnings	2,686.5	2,500.2
Total Equity Capital	4,991.2	4,449.3
COMMITMENTS (l) and (m)		
	$8,258.9	$7,953.3

See accompanying notes.

WESTERN ELECTRIC COMPANY, INCORPORATED

STATEMENTS OF CHANGES IN FINANCIAL POSITION

	(Dollars in millions) Year ended December 31	
	1981	1980
SOURCE OF FUNDS		
Net Income	$ 711.3	$ 693.2
Depreciation and Amortization	361.0	289.5
Deferred Income Taxes	27.5	24.2
Investment Tax Credits - Net	27.2	33.5
Change in Accumulated Provisions	(16.2)	7.9
Total Provided from Operations	1,110.8	1,048.3
Equity Investments from American Telephone and Telegraph Company	355.6	204.5
Proceeds from Sale of Investment in Western Electric International, Incorporated	-	68.4
Reduction of Investment in and Loans to Subsidiary Companies	22.9	62.4
Reduction of Loans to Bell Telephone Laboratories, Incorporated	12.0	65.0
Other - Net	11.8	15.9
	1,513.1	1,464.5
APPLICATION OF FUNDS		
Dividends	525.0	470.0
Expenditures for Plant and Equipment	586.1	554.1
Investment in and Loans to Subsidiary and Joint Venture Companies	33.9	105.9
Investments in and Loans to Bell Telephone Laboratories, Incorporated	88.0	130.0
Repayment of Long-term Debt	9.7	10.4
	1,242.7	1,270.4
INCREASE IN WORKING CAPITAL	$ 270.4	$ 194.1
ANALYSIS OF INCREASE IN WORKING CAPITAL		
Increase (Decrease) in Current Assets:		
Cash and Temporary Investments	$ (.3)	$ (6.6)
Receivables	210.7	105.9
Inventories	(205.4)	520.8
	5.0	620.1
Increase (Decrease) in Current Liabilities:		
Payable to Suppliers and Employees and Other Accruals	18.9	(112.1)
Federal, State and Local Taxes Payable	22.4	(33.2)
Deferred Income Taxes	(.2)	37.9
Short-term Debt	(306.5)	533.4
	(265.4)	426.0
INCREASE IN WORKING CAPITAL	$ 270.4	$ 194.1

See accompanying notes.

WESTERN ELECTRIC COMPANY, INCORPORATED

NOTES TO FINANCIAL STATEMENTS

Years Ended December 31, 1981 and 1980

Western Electric Company, Incorporated ("Western Electric" or "the Company"), incorporated under the laws of the State of New York on August 19, 1966 as the successor of a firm founded in 1869 and first incorporated in 1872, is wholly-owned by American Telephone and Telegraph Company ("AT&T") and operates in one industry, namely, communications products and services. The Company is organized primarily to serve its major customer, the Bell System, as its manufacturing and supply unit.

(a) Accounting Policies - The financial statements reflect the application of certain accounting policies described in this note. (See also note (d).)

Basis of Presentation - The Company's primary financial statements are its consolidated financial statements, which include the accounts of the Company and its principal subsidiaries, Teletype Corporation and Nassau Recycle Corporation, which are wholly-owned, and through September 30, 1980 Western Electric International, Incorporated. Effective October 1, 1980, the Company sold Western Electric International, Incorporated to AT&T for an amount which approximated Western Electric International, Incorporated's net book value. In the accompanying financial statements of Western Electric Company, Incorporated (parent), investments in the principal subsidiaries are carried at equity value and at December 31, 1981 and 1980 included loans of $42 million and $33 million, respectively. Bell Telephone Laboratories, Incorporated ("BTL"), owned 50% by the Company and 50% by AT&T, is a nonprofit entity and the Company's investment therein is stated at cost (which equals equity) and at December 31, 1981 and 1980 included loans of $75 million and $34 million, respectively.

Depreciation and Amortization - Depreciation is provided on a straight-line basis on composite accounts for assets acquired prior to January 1, 1980. Effective January 1, 1980, the Company provides depreciation on an accelerated method on composite accounts for assets placed in service subsequent to December 31, 1979. Facilities installed in leased premises are amortized over the terms of their respective leases. Accelerated depreciation is computed for income tax purposes on eligible plant and equipment placed in service after December 31, 1969.

WESTERN ELECTRIC COMPANY, INCORPORATED

NOTES TO FINANCIAL STATEMENTS

Years Ended December 31, 1981 and 1980

Development Expense - Development expense, principally incurred by BTL, is charged to costs as incurred unless such costs are recoverable under specific contractual arrangements with customers.

Income Taxes - The Company's income is included in the consolidated federal income tax return filed by AT&T. The portion of the total tax borne by the Company is substantially the same as on a separate return basis. Deferred income taxes have been provided for timing differences between income for financial statement purposes and taxable income, principally accelerated depreciation, the accrual for vacation pay, the capitalization in inventory of certain tax deductible costs, the capitalization in plant and equipment of taxes, interest and employee pension accruals, and the provisions for such items as force adjustments, plant reconversion and plant consolidation.

Investment Tax Credits - The investment tax credit is amortized by credits to the provision for federal income tax over the service life of the plant and equipment which gave rise to the credit.

Inventories - Inventories are stated at the lower of cost, principally determined on the first-in, first-out (FIFO) basis, or market, with provision for loss on shelf-worn and defective material and obsolescence.

Long-term Contracts - Long-term contracts are accounted for on the basis of percentage of completion or unit of delivery.

Other - It is the Company's practice to charge to costs and expenses currently amounts which will be required for (1) force adjustments necessary for payments to employees either laid off or downgraded to lower paying jobs or covered under the supplemental income protection plans, (2) plant reconversion to provide for moving into temporary locations to meet unusual needs of the Bell System and later withdrawing from these locations, (3) plant reconversion associated with United States Government defense work and, (4) certain other accruals to provide for such items as product guarantee and vacations.

(b) At December 31, 1981 and 1980, $11.5 million and $26.9 million, respectively, of development costs were included in inventory under contractual arrangements with affiliated companies.

(c) Effective January 1, 1980, the Company adopted the provisions of Financial Accounting Standards Board Statement No. 34, "Capitalization of Interest Cost"; accordingly, approximately $24 million and $15 million of interest expense was capitalized in 1981 and 1980, respectively.

(d) Prior to October 1, 1980, the Company sponsored noncontributory plans which covered all of its employees for service pensions and certain death benefits. Since October 1, 1980, employees of the Company have been covered by two national Bell System noncontributory pension and death benefit plans sponsored by AT&T and the Bell System companies, including the Company, one for management employees and another for nonmanagement employees. The Internal Revenue Service has approved these two newly designed plans. Contributions to such plans are made to irrevocable trust funds. It has been, and continues to be, the policy of the Company to make contributions which are equal to the current year cost of the plans determined on a going concern basis by actuarial methods specified by the Employee Retirement Income Security Act of 1974 ("ERISA"). The following data relate to plan costs:

	(Dollars in millions) Year Ended December 31	
	1981	1980
Current year cost	$493.1	$602.8
Current year cost as a percent of salaries and wages	12.5%	16.0%

Amendments to the plans during 1981 had the effect of increasing 1981 pension cost by approximately $24 million. The changes in plan design effective October 1, 1980, together with changes in actuarial assumptions and 1980 experience, reduced 1981 pension cost by approximately $209 million. Changes in actuarial assumptions, an amendment to the plans prior to October 1, 1980, and changes in plan design effective October 1, 1980 decreased pension cost for 1980 by approximately $57 million.

Statement of Financial Accounting Standards No. 36 ("Statement No. 36") requires that certain disclosures be made of the actuarial present value of accumulated plan benefits and the fair value of net assets available for plan benefits ("fair value" essentially is current market value). But, with the October 1, 1980 merger of the individual Bell System companies' plans, including the Company's plan, into the two national Bell System plans, such disclosures are not presented for the Company because the structure of the new plans does not permit the plans' assets and the accumulated benefits data to be disaggregated. However, based on the latest actuarial

The principal item included in the provision for deferred income taxes relates to the excess of tax over book depreciation, amounting to $10.1 million and $20.1 million for the years ended December 31, 1981 and 1980, respectively.

The Company's effective federal income tax rates as determined from the statements of income (federal income tax divided by the sum of federal income tax and Net Income) of 42.1% in 1981 and 42.5% in 1980 were less than the 46% federal income tax statutory rate due principally to amortization of investment tax credits and, in 1981, the research and experimentation tax credit.

(f) During 1981 and 1980, there were no written or oral agreements or arrangements requiring the Company to maintain compensating balances in relation to its borrowings under lines of credit, although the Company did maintain balances in banks as compensation for account handling services and against unused lines of credit.

(g)

	(Dollars in millions) December 31	
	1981	1980
Inventories:		
Completed	$1,283.6	$1,282.2
In process	1,211.1	1,333.5
Raw materials and supplies	555.0	641.6
Less progress payments (United States Government)	1.6	3.8
Total Inventories	$3,048.1	$3,253.5

(h)

	(Dollars in millions) December 31	
	1981	1980
Plant and Equipment - at cost:		
Land	$ 67.0	$ 60.1
Land improvements	112.6	106.1
Buildings	1,131.7	1,039.3
Machinery	2,159.1	1,913.4
Small tools, furniture and fixtures and other	903.6	839.5
Total Plant and Equipment	$4,374.0	$3,958.4

WESTERN ELECTRIC COMPANY, INCORPORATED

NOTES TO FINANCIAL STATEMENTS

Years Ended December 31, 1981 and 1980

(i) Short-term Debt at December 31 consists of:

	(Dollars in millions) 1981	1980
Commercial paper	$ 520.8	$ 793.6
Master notes*	154.4	188.1
Total Short-term Debt	$ 675.2	$ 981.7

* Unsecured promissory notes payable on demand bearing interest at the effective General Motors Acceptance Corporation discount rates, as defined, for ordinary commercial paper borrowings.

	(Dollars in millions) 1981	1980
Weighted average annual interest rates at December 31:		
Commercial paper	12.1%	19.1%
Master notes	11.9	15.6
Maximum amount outstanding at any month-end	$1,097.9	$1,092.9
Average amount outstanding during the year	898.2	874.0
Weighted average interest rates	16.2%	12.5%

** Computed by dividing the average daily face amount of Short-term Debt into the aggregate related interest expense.

At various dates during 1981, the Company established one-year commercial paper back-up lines of credit aggregating $519 million with interest payable based on the prime rate. There were no borrowings under these lines of credit at December 31, 1981. In accordance with the terms of certain agreements, the Company is required to pay commitment fees ranging from 3/32 to 3/8 of 1% per annum on $503 million of the unused commitments. The remaining credit lines do not require a commitment fee.

valuations of the two national plans, utilizing assumed rates of return of 8.9% and 8.0% for 1980 and 1979, respectively, the fair value of net assets available for plan benefits exceeds the actuarial present value of vested and nonvested accumulated plan benefits at December 31, 1980 and 1979.

The Company believes that misleading inferences concerning the plans' funding status may result from a comparison of the actuarial present value of accumulated plan benefits with the fair value of net assets available for plan benefits. This is because plan assets have been accumulated by making contributions equal to current year costs determined on a going concern basis as required by ERISA, while the determination of the actuarial present value of accumulated plan benefits required by Statement No. 36 is essentially a "plan termination" type calculation, which uses methods and assumptions which are not the same as those used to determine current year pension costs. The required method for determining the actuarial present value of accumulated plan benefits fails to take into consideration probable future events such as wage and salary increases and future employee service which have been taken into consideration in determining costs for the plans. Furthermore, the fair value of net assets available for plan benefits will fluctuate which also may create erroneous impressions with respect to long-term progress on funding the pension plans.

(e) The provisions for income taxes consist of:

	(Dollars in millions) Year Ended December 31	
	1981	1980
Current:		
Federal	$458.2	$411.2
State and local	65.4	61.4
Total Current	523.6	472.6
Deferred:		
Federal	31.2	67.0
State and local	6.4	11.1
Total Deferred	37.6	78.1
Net addition to unamortized Investment Tax Credits:		
Federal	27.2	33.5
Total Provisions:		
Federal	516.6	511.7
State and local	71.8	72.5
Total	$588.4	$584.2

WESTERN ELECTRIC COMPANY, INCORPORATED

NOTES TO FINANCIAL STATEMENTS

Years Ended December 31, 1981 and 1980

(j) Long-term Debt at December 31 consists of:

	(Dollars in millions) 1981	1980
Sinking Fund Debentures		
8-3/8% due October 1, 1995 ($6.0 million per year to 1994)	$107.9	$113.9
7-1/2% due June 15, 1996 ($4.0 million per year to 1995)	76.0	79.7
Promissory Notes		
8.15% due May 15, 1983	200.0	200.0
5.50% due June 15, 1997 ($7.0 million per year 1983 to 1996)	150.0	150.0
9% due April 1, 2000 ($7.5 million per year 1986 to 1999)	150.0	150.0
7.50% due June 1, 2003 ($5.0 million per year 1984 to 2002)	125.0	125.0
	808.9	818.6
Unamortized discount	(1.8)	(2.1)
Total Long-term Debt	$807.1	$816.5

Mandatory sinking fund payments and Promissory Notes prepayments are shown in parentheses. In anticipation of sinking fund requirements, the Company has purchased and canceled its Debentures at various times. The amounts of Debentures available to meet future sinking fund requirements were $6.1 million of the 8-3/8% Debentures and $4.0 million of the 7-1/2% Debentures at December 31, 1981 and $6.1 million of the 8-3/8% Debentures and $4.3 million of the 7-1/2% Debentures at December 31, 1980.

(k) The equity capital of the Company was increased $355.6 million in 1981 and $204.5 million in 1980 through additional equity investments made by AT&T of which $5.6 million in 1981 and $4.5 million in 1980 were made in connection with the Bell System Employee Stock Ownership Plan.

(l) Rental expense principally covers real estate and computer equipment used in production, warehouse and office operations. Rental expense for all operating leases except those with terms of a month or less for the years ended December 31, 1981 and 1980 was $105 million and $103 million, respectively. Subleases in each year were negligible. The portion of the above rental expense for contingent rentals, such as those based on usage, was

about $3 million in each year. At December 31, 1981 the aggregate minimum rental commitments under operating leases that have initial or remaining noncancelable lease terms in excess of one year are as follows:

	(Dollars in millions)
1982	$ 33.1
1983	26.4
1984	20.4
1985	13.3
1986	9.2
Thereafter	42.0
Total	$144.4

(m) The Company has outstanding letters of credit at December 31, 1981 in the amount of $36.6 million issued in favor of, and as required by, those for whom certain work is proposed to be done.

(n) In November 1974 the Department of Justice brought a civil action under the Federal antitrust laws in the United States District Court for the District of Columbia naming the Company, AT&T and BTL as defendants, and the 23 Bell System telephone companies as co-conspirators but not defendants. The complaint charges unlawful conspiracy to monopolize, attempt to monopolize and monopolization of interstate trade and commerce in telecommunications service and equipment in violation of Section 2 of the Sherman Antitrust Act (15 U.S.C. Section 2). On January 8, 1982, AT&T announced it had agreed for itself and on behalf of the Company to a proposal by the Department of Justice which modified the existing 1956 Consent Decree. As a result, both the Department of Justice and AT&T have stipulated dismissal of this civil antitrust action. The new Consent Decree is subject to further court proceedings. The terms of the new Consent Decree require that AT&T divest those parts of Bell System operating telephone companies that provide local exchange and exchange access service and also require termination of the License Contracts between AT&T and the operating telephone companies and the Standard Supply Contracts between Western Electric and the operating telephone companies. AT&T would continue to own the Company and BTL. Ownership of customer premises equipment would remain with AT&T. The Company believes that the terms of the new Consent Decree will have no material adverse impact on the Company's 1981 financial statements.

WESTERN ELECTRIC COMPANY, INCORPORATED

NOTES TO FINANCIAL STATEMENTS

Years Ended December 31, 1981 and 1980

In June 1981, in an antitrust action which involved terminal equipment, Litton Industries, Inc. ("Litton") was awarded $276.8 million in treble damages against the Company, AT&T, BTL and certain Bell System operating companies in the United States District Court for the Southern District of New York (Litton et al. v. AT&T et al., CA No. 76-2512). Defendants are seeking to have this award set aside. It is the Company's opinion that any monetary liability or financial impact to which it might be subject after final adjudication would not be material in amount.

In addition to the antitrust actions by the Department of Justice and by Litton described above, the Company (and in one instance, its wholly-owned subsidiary, Nassau Recycle Corporation) has been named a party in a number of private antitrust actions which allege, among other things, violations of Federal and state antitrust laws and claim actual or potential monetary damages and a variety of equitable relief. In the opinion of the Company, any monetary liability to which it and Nassau Recycle Corporation might be subject as a result of all such actions would not be material in amount and any equitable relief which might be granted would not have a material effect on the business of the Company and its subsidiary, Nassau Recycle Corporation.

On July 28, 1981, the Federal Communications Commission ("FCC") released a Report Order and Notice of Inquiry into "proposals for rules governing procurement of telecommunications equipment by the Bell Operating Companies." The FCC rejected AT&T's proposal for a new procurement entity which had been submitted in response to the FCC's Final Decision and Order in Docket 19129. An FCC Staff proposal was appended to the Notice of Inquiry, although the Commission said it did "not in any way endorse this proposal." The FCC said that it wished to "examine as many alternatives as possible" and it encouraged the submission of "detailed proposals and comments." The AT&T comments pointed to the substantial Bell System restructuring ordered by the FCC in the Second Computer Inquiry proceeding and to the uncertainties arising out of attempts in Congress to enact new communications legislation and urged that no procurement-driven structural rearrangements be mandated at this time. Comments of other parties took a variety of positions on the issues raised by the FCC's Notice of Inquiry. Reply comments have also been filed. Although the eventual outcome of this inquiry (CC Docket No. 80-53) is uncertain, the Company believes any such outcome will not have a material adverse impact on the Company's 1981 financial statements.

WESTERN ELECTRIC COMPANY, INCORPORATED

SUPPLEMENTARY DATA

ACCOUNTING FOR THE EFFECTS OF INFLATION (UNAUDITED)

Continued high rates of inflation have drawn increased attention to the need to assess both the impact of inflation on business and the results of management's efforts in coping with it. No consensus has been reached either on the preferability of any one reporting method or on the practical usefulness of the resulting data. The Financial Accounting Standards Board ("FASB"), believing that additional experience should be gained and experimentation undertaken with respect to reporting the effects of inflation, issued Statement of Financial Accounting Standards No. 33 ("Statement No. 33") which requires disclosure of supplementary data to reflect the effects of general inflation (constant dollar) and the effects of changes in specific prices (current cost). The data in Tables A and B have been prepared to comply with Statement No. 33; however, the Company believes that it should be used with care because the data neither completely or accurately portray inflation's effects.

Traditionally, financial statements have been prepared on the basis of historical costs, i.e., the actual number of dollars exchanged at the time each transaction took place. However, it is recognized that general inflation has caused the purchasing power of dollars to decline, the result of which is the presentation of financial statement elements in dollars of varying purchasing power. To eliminate this disparity, such elements may be restated in "constant" dollars, each of which has equal purchasing power. To reflect the effects of inflation and thus express operating results in dollars of comparable purchasing power, Statement No. 33 requires the Company to show what the FASB characterizes as "income from continuing operations" as if the cost of products and services and depreciation of plant and equipment had been based on asset amounts expressed in dollars of constant purchasing power. (This is shown in column (b) of Table A, stated in average 1981 dollars.) This adjustment is derived from the application of the Consumer Price Index for All Urban Consumers ("CPI-U"), a measure of inflation based on changes in the costs to consumers of a wide range of commodities and services. (The 1981 average CPI-U has been estimated based on actual statistics through November 1981.)

Technological improvements, changes in supply and demand, and productivity gains cause the specific prices of products and services purchased by a particular business to fluctuate differently from price changes that would be caused solely by general inflation.

WESTERN ELECTRIC COMPANY, INCORPORATED

SUPPLEMENTARY DATA

ACCOUNTING FOR THE EFFECTS OF INFLATION (UNAUDITED)

To reflect the effects of such specific price changes on operating results, Statement No. 33 requires that the Company also show "income from continuing operations" as if the cost of products and services and depreciation of plant and equipment had been based on the "current cost" of these or comparable assets, rather than on historical cost. (This calculation is shown in column (c) of Table A, stated in average 1981 dollars.) The current cost of inventories represents the cost of purchasing or producing the goods concerned at year-end prices. The current cost of plant and equipment has been calculated by applying internally-generated indices to investments in each of the major plant accounts.

In computing "income from continuing operations," only cost of products and services and depreciation expense have been adjusted to show the effects of inflation. Because most other costs and expenses are current year transactions, they already are recorded in dollars of approximately current purchasing power.

In accordance with requirements of Statement No. 33, no adjustments have been made to reflect any effects of inflation on the provision for federal income tax. The effective federal income tax rate (federal income tax divided by the sum of federal income tax and "income from continuing operations") for the historical data in column (a) of Table A would be 42.1%. The rate reflecting adjustments for inflation would be 77.4% for column (b) and 49.1% for column (c) of Table A. While the federal income tax used in these computations includes Investment Tax Credits and tax deferrals relating to accelerated depreciation, the effects of inflation on effective tax rates also would be dramatically increased, even though in lower percentages, if these tax benefits were excluded. These tax benefits were intended by Congress to provide funds for investment in other capital assets in order to increase productivity and employment.

Amounts shown as "net assets at year-end" in Table B are Equity Capital as shown in the historical cost financial statements, adjusted for general inflation by the difference between inventories and plant and equipment at historical cost and inventories and plant and equipment in constant dollars and adjusted for changes in specific prices by the difference between inventories and plant and equipment at historical cost and inventories and plant and equipment at current cost.

WESTERN ELECTRIC COMPANY, INCORPORATED

SUPPLEMENTARY DATA

ACCOUNTING FOR THE EFFECTS OF INFLATION (UNAUDITED)

The reader should note the item identified in the Supplementary Tables as "benefits from decline in purchasing power of net amounts owed." During periods of inflation, lenders of money experience a loss due to the fact that amounts owed to them will be repaid in dollars having less purchasing power than the dollars originally lent; it is in anticipation of such loss that interest rates are so high during inflationary times. Conversely, to the extent that lenders are losing purchasing power, borrowers are benefiting. In assessing the impact of inflation on business, the Company believes that the benefits from inflation's effects on money that is borrowed should be viewed as an offset to interest expense. The benefit, however, does not provide funds to the Company or increase the amount of cash available for dividends.

The reader should also note that the increase in the specific prices of inventories and plant and equipment actually has been less than the general increase in the rate of inflation. This difference primarily is attributable to benefits of technological improvements. These technological improvements, combined with the improvements in manufacturing productivity, have been responsible for the Company's success in keeping the rate of growth in the prices of its products below the rate of growth in the general level of prices.

Statement No. 33 also requires that the data shown in Table B be presented in a five-year summary, restated into the average purchasing power of the dollar during 1981. The calculations for these restatements have been made by applying the average CPI-U for 1981 to the data for the years 1977 through 1980. No adjustments have been made to the historical cost information, which is presented for comparison purposes only. The effect of these calculations is to increase the number of dollars shown for each year as compared to the actual number of dollars received. Sales in constant dollars do not reflect the Company's ability to counter the impact of inflation through productivity gains, the benefits of which are passed on as lower prices to its customers.

WESTERN ELECTRIC COMPANY, INCORPORATED

SUPPLEMENTARY DATA

ACCOUNTING FOR THE EFFECTS OF INFLATION (UNAUDITED)

TABLE A

Supplementary Financial Data Adjusted
for the Effects of Inflation and Changing Prices
(Unconsolidated)

	(Dollars in millions) As Reported in the Historical Cost Financial Statements (a)	Adjusted for General Inflation (Constant Dollar) (b)	Adjusted for Changes in Specific Prices (Current Costs) (c)
For the Year 1981			
Sales	$12,753	$12,753	$12,753
Total Costs and Expenses excluding depreciation and interest expenses	10,983	11,317	10,987
Depreciation expense	361	532	490
Interest expense	187	187	187
Other income	(77)	(22)	(35)
Provisions for income taxes	588	588	588
	12,042	12,602	12,217
Income from continuing operations	$ 711	$ 151	$ 536

(Continued on following page.)

WESTERN ELECTRIC COMPANY, INCORPORATED

SUPPLEMENTARY DATA

ACCOUNTING FOR THE EFFECTS OF INFLATION (UNAUDITED)

TABLE A (CONT'D)

Supplementary Financial Data Adjusted
for the Effects of Inflation and Changing Prices
(Unconsolidated)

	(Dollars in millions) As Reported in the Historical Cost Financial Statements (a)	Adjusted for General Inflation (Constant Dollar) (b)	Adjusted for Changes in Specific Prices (Current Costs) (c)
Benefits from decline in purchasing power of net amounts owed		$ 107	$ 107
Amount by which current cost of inventories and plant and equipment would have increased if computed by reference to changes in general price levels			$ 728
Increase in current cost of inventories and plant and equipment			370
Difference, primarily due to benefits of technological improvements			$ 358
Inventories (year-end 1981 dollars)		$3,177	$3,131
Plant and equipment, net of accumulated depreciation (year-end 1981 dollars)		$4,691	$4,391

WESTERN ELECTRIC COMPANY, INCORPORATED

SUPPLEMENTARY DATA

ACCOUNTING FOR THE EFFECTS OF INFLATION (UNAUDITED)

TABLE B

Supplementary Five-Year Comparison of Selected Financial Data

(Unconsolidated)

	(Dollars in millions)				
	1981	1980	1979	1978	1977
Sales in average 1981 dollars	$12,753	$13,010	$13,165	$12,897	$12,038
Historical cost information:					
Income from continuing operations	$ 711	$ 693	$ 636		
Net assets at year-end	4,991	4,449	4,022		
Historical cost information adjusted for general inflation (average 1981 dollars): *					
Income from continuing operations	$ 151	$ 134	$ 264		
Net assets at year-end	6,948	6,774	6,655		
Historical cost information adjusted for changes in specific prices (average 1981 dollars): *					
Income from continuing operations	$ 536	$ 245	$ 436		
Difference between the amount by which current cost of inventories and plant and equipment would have increased if computed by reference to changes in general price levels and increase in current cost of inventories and plant and equipment	358	94	284		
Net assets at year-end	6,600	6,431	6,348		
Other information: *					
Benefits from decline in purchasing power of net amounts owed in average 1981 dollars	$ 107	$ 95	$ 98		
Average CPI-U (1981 estimated)	272.7	246.8	217.4	195.4	181.5

* Certain information for the years prior to 1979 is not disclosed since it is impractical to obtain.

ARTHUR YOUNG

ARTHUR YOUNG & COMPANY
277 PARK AVENUE
NEW YORK, NEW YORK 10172

June 30, 1982

Western Electric Company, Incorporated
222 Broadway
New York, New York 10038

We have read the letter dated June 30, 1982 from Robert S. Kern, chief financial officer of Western Electric Company, Incorporated, submitted to the Regional Administrator of the Environmental Protection Agency in support of the use of the financial test, as specified in Subpart H of 40 CFR Parts 264 and 265, to demonstrate financial responsibility for liability coverage or closure and/or post-closure care at the Company's manufacturing facilities at the locations as listed in the letter.

In connection with Subpart H of 40 CFR Parts 264 and 265, we have compared to the independently audited unconsolidated financial statements of Western Electric Company, Incorporated for the year ended December 31, 1981, the specified data in the attachment to that letter indicated as being derived from such independently audited unconsolidated financial statements. In connection with this comparison, no matters came to our attention that caused us to believe that the specified data in the attachment should be adjusted.

This report is solely to assist you in complying with the reporting requirements associated with the financial test, as specified in Subpart H of 40 CFR Parts 264 and 265, to demonstrate financial responsibility for liability coverage or closure and/or post-closure care, and should not be referred to or used for any other purpose.

Arthur Young & Company

C.2 Compliance/ Enforcement

Re: Franklin County
OHD004282703
HWFAB 01-25-0620

Mr. C. W. Gerhard
Chief Environmental Control
Department 42650
Western Electric Company Incorporated
6200 East Broad Street
Columbus, Ohio 43213

January 19, 1983

Dear Mr. Gerhard:

On January 14, 1983 Western Electric was inspected by the Ohio Environmental Protection Agency to determine if it was in compliance with Federal/State Interim Status Hazardous Waste Regulations promulgated under the Resource Conservation and Recovery Act (RCRA, Public Law 94-580).

As a result of this inspection it was determined that Western Electric, Columbus, Ohio was substantially in compliance with Title 40 Code of Federal Regulations Part 262 and the following section and Subparts of 265: 265.16, Subpart C, Subpart D and Subpart I.

The following two deficiencies noted during the inspection must be corrected and written confirmation of same provided to this office within 30 days.

1. 40 CFR Part 262.21(a)(5), Description of Waste

   The word "Waste" must precede the name of the material on the manifest as per 49 CFR Part 172.101(c)(10).

2. 40 CFR Part 262.34(a)(2)(3), Accumulation Date and Label

   The date upon which accumulation period begins must be marked on each roll off container. Each roll off container must be marked with the words "Hazardous Waste".

Central District Office
2244-46 S. Hamilton Rd., Columbus, Ohio 43227-4396

Please call (614-864-3195) if you have any questions regarding the inspection or RCRA Regulations.

Sincerely,

Lundy J. Adelsberger
Division of Hazardous Materials Management
Central District Office

LJA/sc

cc: Ms. Paula Cotter, Compliance Unit, DHMM, C.O.
cc: Ms. Laura Whitacre, Engineering Section, DHMM, C.O.
cc: Mr. Ken Westlake, Region V, U.S. EPA

Re: Franklin County
OHD004282703
HWFAB 01-25-0620

Mr. C. W. Gerhard
Chief Environmental Control
Department 42650
Western Electric Company
6200 East Broad Street
Columbus, Ohio 43213

September 9, 1982

Re: RCRA Inspection, June 28, 1982, by Ohio Environmental Protection Agency

Dear Mr. Gerhard:

As of the date of this letter the Ohio EPA, Central District Office, Division of Hazardous Materials Management, has not received the requested written response to the June 28, 1982, RCRA Inspection.

If this office does not receive a written response within 10 days this matter will be referred to the Ohio EPA, Division of Hazardous Materials Management, Compliance Unit, for any remedial actions they deem necessary.

If you have any questions please contact me at (614) 864-3195.

Sincerely,

Lundy J. Adelsberger
Environmental Scientist
Division of Hazardous Materials Management
Central District Office

LJA/sc

cc: Ms. Kathleen Homer, SIO, U.S. EPA, Region V
cc: Ms. Paula Cotter, Compliance Unit, DHMM, C.O.

RCRA INTERIM STATUS INSPECTION FORM

PART 1. GENERAL INFORMATION

U.S. EPA I.D. NO. OHD004282703

Facility: Western Electric Company, Incorporated Address: 6200 East Broad Street

City: Columbus State: Ohio Zip Code: 43213 Telephone: 614-860-5074

Facility Operator: Mr. P. A. Klisares Title: General Manager Telephone: 614-860-2000

Facility Owner: A T & T Western Electric Address: 222 Broadway

City: New York State: New York Zip Code: 10038 Telephone: 212-571-2345

Type of Ownership: X Private _____ Government State HWFAB No. 01-25-0620

Date of Inspection: June 28, 1982 Time of Inspection: (Start) 9:30 AM (Finish) 4:00 PM

Advance Notification? ____ No X Yes: _____

Weather Conditions: Warm and Humid

_____ County: Franklin

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	Mr. Dale Howell	Plant Engineer	614-860-5143
2.	Mr. Andy Anderson	Envornmental Engineer	614-860-5074
3.			
4.			

RCRA INTERIM STATUS INSPECTION FORM

INSPECTOR(S)

	(Name)	(Title)	(Telephone)
1.	Mr. Lundy Adeslberger	Environmental Scientist	614-466-6450
2.	Mr. Steve Rath	District Engineer DHMM/DLPC	614-466-6450
3.	Ms. Laura Whitacre	Environmental Scientist	614-466-6450
4.			

1. Type(s) of hazardous waste site activity: A. X Generation B. X Storage C. ____ Treatment
D. ____ Transportation E. ____ Disposal

2. Specific hazardous wastes handled at this facility (EPA HW#):

a) Listed Wastes: F001 & F002 (tetrachloroethylene, trichloroethylene, 1,1,1-trichloroethane, chlorinated fluorocarbons); F003 (acetone, methanol); F005 (toluene); F006 (wastewater treatment sludge from electroplating); F007 (spent cyanide plating bath solution); F008 (cyanide plating bath sludge); F009 (spent stripping and cleaning solutions from electroplating where cyanides are used)

b) Non-Listed Wastes: X I (D001) X C (D002) ____ R (D003) ____ E (D004-D017)

D001 (waste ethanol); D002 (ammonia hydroxide etching solution)

3. Has this facility submitted a Part A Permit Application? X Yes ____ No

4. Does this facility store, treat or dispose of any hazardous waste from any off-site domestic sources?

____ Yes, See Remark # ____ X No

5. Does this facility store, treat or dispose of any hazardous waste from any foreign sources?

_____ Yes, See Remark # _____ X No

6. Does this facility transport hazardous waste materials off-site for itself or other generators?

_____ Yes, Complete Part 3 (Transp.) X No

a) P.U.C.O. Registration Number _____

7. A brief description of site activity:
Manufacture and assembly of Electro-Mechanical and Electronic Telephone Switching Equipment. Principle Central Office Telephone Equipment Manufactured:

Crossbar Switching Systems
Electronic Switching Systems
Piece Parts
Apparatus
Local Cable and Equipment

Site Activity:		S	T	D
Containers	I	X		
Tanks	J			
Surf. Imp.	K			
Waste Pile	L			
Land Treat.	M			
Landfill	N			
Incineration	O			
Thermal Treat.	P			
Chem/Phys/Biol	Q			
Under. Inj.	R			

REMARKS, PART 1. (GENERAL INFORMATION)

I. Western Electric disposes of their waste ethanol by dumping it on the ground in back of the facility. This method of disposal is in violation of 40 CFR Part 262, failure to determine if the waste is hazardous, and Part 265, noncompliance with acceptable management practices for a hazardous waste during the period of interim status. This office recommends that Western Electric discontinue this present practice and proceed as follows:

A. Determine if the waste ethanol is hazardous as per 40 CFR Part 262.11.

1. If it is not a hazardous waste contact the Division of Air Pollution Control and/or Division of Wastewater at (614) 466-6450 to determine if any permits are required for the present method of disposal.

REMARKS, PART 1. (GENERAL INFORMATION)

2. If it is determined that the waste ethanol is hazardous Western Electric should come into compliance with the applicable Parts of 262 and 265 and:

(a) Have the waste ethanol processed by an approved recycling facility.

- OR -

(b) Have the waste ethanol removed by an approved disposal facility and modify your permit.

- OR -

(c) Request a Hazardous Waste Permit Modification for the present method of waste ethanol disposal.

II. A review of Western Electric's Part A Permit revealed inconsistencies which they should consider updating to reflect their current operations. This office recommends that Western Electric review the following items:

A. Page 1 of 5 - Process Design Capacity -

1. (Line Number 2) This refers to spent ammonium etching solution which is is being recycled.

2. (Line Number 4) This refers to the industrial pretreatment facility's discharge to the Columbus Sanitary Sewer.

B. Page 3 of 5 - Estimated Annual Quantity of Waste -

1. (Line Number 10) Refers to spent ammonium etching solution.

2. (Line Number 11) Refers to pretreatment facility's discharge.

As per my interpretation of 122.24 and 40 CFR Part 261 the above do not have to be included in the Part A Permit.

REMARKS, PART 1. (GENERAL INFORMATION)

C. Page 3 of 5 - Estimated Annual Quantity of Waste -

1. (Line Number 5) Reflects an inaccurate amount as per my discussion with Mr. Dale Howell, Plant Engineer. The Process Code S03 (waste pile) is incorrect and should be changed to S01 (roll off container).

2. (Line Number 9) Western Electric should reevaluate this listing to determine if any of their operations result in the production of an F010 hazardous waste meeting the listing description of 261.31.

Any changes in the Part A Permit should be sent to:

Ohio EPA, Division of Hazardous Materials
Attn: Mr. Paul Flanigan, Engineering Section
361 East Broad Street
Columbus, Ohio 43215

Western Electric should include a revised Part A Permit and a narrative explaining the request.

PART 2. GENERATOR REQUIREMENTS

	Yes	No	N/A	Remark #
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Sections 261 and 3745-51 in compliance with the requirements of Sections 262.11 and 3745-52-11.	X			
2. Does this facility generate any hazardous wastes that are excluded from regulation under Sections 261.4 and 3745-51-04 (statutory exclusions) or Sections 261.6 and 3745-51-06 (recycle/reuse)?	X			No. 3
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Sections 265.1(c)(9) and 3745-55-C-9 or via operation of an elementary neutralization unit and/or wastewater treatment unit (Sections 265.1(c)(10) and 3745-55-C-10.	X			No. 4
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Sections 262.21(a), (b) and 3745-52-21-A-B and the minimum number of copies required by Sections 262.22 and 3745-52-22.		X		No. 5
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Sections 262.20 and 3745-52-20.	X			
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Sections 262.23 and 3745-52-23.	X			
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Sections 262.42(a), (b) and 3745-52-42.	X			
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Sections 262.40 and 3745-52-40.	X			

	Yes	No	N/A	Remark #
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Sections 262.30, 262.31 and 262.32(a) and 3745-52-30, 52-31, and 52-32-A).	X			
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 Liters) or less is affixed with a completed hazardous waste label as required by Sections 262.32(b) and 3745-52-32-B.	X			
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Sections 262.33 and 3745-52-33.	X			
6. The generator meets the following recordkeeping and reporting requirements:				
a) The generator has submitted an annual report for all hazardous waste shipped off-site as required by Sections 262.41(a) and 3745-52-41-A-B.	X			
b) The generator has submitted an annual report for all hazardous waste treated, stored or disposed of on-site as required by Sections 262.41(b) and 3745-52-41-C and in compliance with Sections 265.71 and 3745-55-71, when applicable.			X	
7. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Sections 262.50 and 3745-52-50.			X	
8. If the generator elects to store hazardous waste on-site in containers or tanks for 90 days or less without a RCRA storage permit as provided under Sections 262.34 and 3745-52-34, the following requirements with respect to such storage are met:			X	
a) Containers: the waste is stored in closed containers which meet all applicable DOT pre-transport requirements for packaging, labeling and marking.			X	

	Yes	No	N/A	Remark #
b) The date that accumulation began is clearly marked on each container.	___	___	X	_____
c) The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	___	___	X	_____
d) Containers holding ignitable or reactive waste(s) are located at least 50 feet (15 Meters) from the property line (Sections 265.176 and 3745-56-56), and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17 (physical separation, signs and safety) are met.	___	___	X	_____
e) Tanks: the tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 56-72-B and are equipped with a waste-feed cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.	___	___	X	_____
f) Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).	___	___	X	_____
g) Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74-A-B-C).	___	___	X	_____
h) Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74-D-E).	___	___	X	_____
9. The generator has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Sections 262.34 and 3745-52-34).	___	___	X	_____
10. The generator keeps all of the records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records (Sections 262.34 and 3745-52-34).	___	___	X	_____

	Yes	No	N/A	Remark #
11. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77) as referenced in Sections 262.34 and 3745-52-34.	___	___	X	___

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND 3745-55-30 THRU 37 AND 3745-55-50 THRU 70 BE MET. COMPLETE THESE SECTIONS OF THE INSPECTION FORM UNDER PART 4 - GENERAL INTERIM STATUS REQUIREMENTS.

REMARKS, PART 2. GENERATOR REQUIREMENTS

III. The spent ammonium etching solution is being recycled.

IV. Western Electric has an industrial pretreatment facility which processes their electroplating waste streams. The effluent is discharged to the Columbus Sanitary Sewer (NPDES permitted) and the hazardous waste sludge (F006) is disposed of at a subtitle C landfill (CECOS).

V. The manifest form must contain all of the information required by 40 CFR Part 262.21 including EPA identification numbers for generator, transporter and designated disposal or recycling center.

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards
C: Preparedness and Prevention
D: Contingency and Emergency
E: Manifest/Records/Reporting
F: Ground Water Monitoring
G: Closure
H: Financial Requirements

Subpart B: General Facility Standards

	Yes	No	N/A	Remark #
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Sections 265.13(a)(1) and 3745-55-13-A-2.				No. 6
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Sections 265.13(b) and 3745-55-13-B).		X		No. 7
3. If required due to the actual hazards associated with the waste material, the operator has prevented unauthorized access to the active portions of the facility and has provided the following features and equipment (Sections 265.14 and 3745-55-14).	X			
a) 24 hour surveillance system.	X			
b) Artificial or natural barrier completely surrounding the active portion of the facility.	X			
c) Controlled entry (gates, monitors) to the active portion of the facility at all times (265.14(2)(ii) and 3745-55-14-B-2-b).	X			
d) "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c) and 3745-55-14-C).	X			

	Yes	No	N/A	Remark #
4. The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. The plan includes the following elements: (Sections 265.15 and 3745-55-15)		X		No. 8
a) Inspect emergency equipment.	X			
b) Inspect monitoring equipment.			X	
c) Inspect security, alarm and communications devices.	X			
d) Inspect process equipment (pipes, pumps, etc.).			X	
e) Inspect containment structures (dikes, curbs, etc.).	X			
f) Inspect facility for structural malfunctions (roof, floor, etc.).	X			
g) Inspect hazardous waste handling/loading areas each day used.		X		No. 9
h) Record of any malfunctions due to equipment or operator errors.			X	
i) Record of any hazardous waste discharges.			X	
5. The facility has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	X			
6. The facility keeps all records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records.	X			
7. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Sections 265.17 and 3745-55-17).	X			

	Yes	No	N/A	Remark #
a) Protection from sources of ignition.	X			
b) Physical separation of incompatible waste materials.			X	
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	X			
d) Any co-mingling of waste materials is done in a controlled, safe manner as prescribed by Sections 265.17(b) and 3745-55-17-B.			X	

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31 and 3745-55-31).		X		
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32 and 3745-55-32).	X			
a) Internal alarm system	X			
b) Access to telephone, radio or other device for summoning emergency assistance.	X			
c) Portable fire control equipment.	X			
d) Water at adequate volume and pressure via hoses sprinklers, foamers or sprayers.	X			
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33 and 3745-55-33).	X			
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled (Sections 265.34 and 3745-55-34).	X			

	Yes	No	N/A	Remark #
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained (265.35 and 3745-55-35).	X			
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout (265.37(a) and 3745-55-37-A).	X			
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented (265.37(b) and 3745-55-37-B).			X	

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51 and 3745-55-51) and contains the following components:	X			
a) Actions to be taken by personnel in the event of an emergency incident.	X			
b) Arrangements or agreements with local or state emergency authorities.	X			
c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.		X		No. 10
d) A list of all emergency equipment including location, physical description and outline of capabilities.	X			
e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel (Sections 265.51(f) and 3745-55-51-F).	X			
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all Local and State emergency service authorities that might be required to participate in the execution of the plan. (Sections 265.53 and 3745-55-53).		X		No. 11

	Yes	No	N/A	Remark #
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54 and 3745-55-54).	X			
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Sections 265.55 and 3745-55-55).	X			
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56 and 3745-55-56.			X	

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

	Yes	No	N/A	Remark #
1. The operator maintains a written operating record at his facility as required by Sections 265.73 and 3745-55-73 which contains the following information:		X		No. 12
a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal (265.73(b)(1) and 3745-55-73-B-1).		X		No. 12
b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).		X		No. 12
c) The estimated (or actual) weight, volume or density of the waste material(s).		X		No. 12
d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).		X		No. 12

	Yes	No	N/A	Remark #
e) The present physical location of each hazardous waste within the facility.		X		No. 12
f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s) (265.73(b)(2) and 3745-55-73-B-2).			X	
g) Records of any waste analyses and trial tests required to be performed.	X			
h) Records of the inspections required under Sections 265.15 and 3745-55-15 (General Inspection Requirements - Subpart B).		X		No. 12
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Sections 265.73(b)(6) and 3745-55-73-B-6.			X	
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart H and Section 3745-56-30, 32 and 34.	X			
2. The operator has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Sections 265.75 and 3745-55-75.	X			

NOTE: THIS REPORT IS NOT THE SAME AS THE REPORT REQUIRED TO BE FILED BY GENERATORS UNDER SECTIONS 262.41 AND 3745-52-41.

3. When applicable, the operator has submitted reports on releases of hazardous wastes, fires, explosions, groundwater contamination data and facility closure (265.77 and 3745-55-77).			X	

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO DNLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

4. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years (Sections 265.71 and 3745-55-71).			X	

	Yes	No	N/A	Remark #
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met (265.71(b) and 3745-55-71-B).	___	___	X	___
b) Any significant discrepancies in the manifest, as defined in Sections 265.72(a) and 3745-55-72-A, are noted in writing on the manifest document (Sections 265.71(a)(2) and 3745-55-71-A-2).	___	___	X	___
5. Any manifest discrepancies have been reconciled within 15 days as required by Sections 265.72(b) and 3745-55-72-B or the operator has submitted the required information to the Regional Administrator/Director.	___	___	X	___
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage or disposal an unmanifested waste report containing all the information required by Sections 265.76 and 3745-55-76 has been submitted to the Regional Administrator/ Director within 15 days.	___	___	X	___

Subpart F: Groundwater Monitoring

NOTE: THESE REQUIREMENTS ARE APPLICABLE TO SURFACE IMPOUNDMENTS, LANDFILLS AND LAND TREATMENT FACILITIES ON AND AFTER NOVEMBER 19, 1981.

	Yes	No	N/A	Remark #
1. The facility has implemented one or more of the following alternatives with respect to the Groundwater Monitoring requirements in Sections 265.90(a) and 3745-55-90-A:				
a) A Groundwater Monitoring System meeting the minimum requirements of Sections 265.91 and 3745-55-91 has been installed which is sampled, tested and operated in accordance with the requirements of Sections 265.92, 265.93, 265.94, 3745-55-92, -93 and -94.	___	___	X	___

	Yes	No	N/A	Remark #
b) A waiver of all or part of the Groundwater Monitoring requirements has been obtained by demonstrating a low potential for the migration of hazardous wastes and constituents in accordance with the requirements of Sections 265.90(c) and 3745-55-91-C.	___	___	X	_____
c) An alternate Groundwater Monitoring System Plan that was first submitted to the Regional Administrator/Director was implemented and is operated and maintained in accordance with Sections 265.90(d) and 3745-55-90-D.	___	___	X	_____

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES:

	Yes	No	N/A	Remark #
1. A written Closure Plan is on file at the facility and contains the following elements: (Sections 265.112 and 3745-56-03)	___	X	___	No. 13
a) A description of how and when the facility will be closed (265.112(a)(1) and 3745-56-03-A-1).	___	X	___	No. 13
b) A description of how any of the applicable closure requirements in other Subparts of Sections 265 and 3745-55,-56,-57,-58 (Tanks, Surface Impoundments, Landfills, etc.) will be carried out.	___	X	___	No. 13
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.	___	X	___	No. 13
d) A description of steps taken to decontaminate facility equipment.	___	X	___	No. 13
e) The year closure is expected to begin and a list of dates over which the various phases of closure are expected to be completed.	___	X	___	No. 13
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.	___	___	X	_____

	Yes	No	N/A	Remark #
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	___	___	X	_____
4. If Closure has been completed, the facility was closed in a manner which minimizes any future problems in compliance with the Closure performance standard in Sections 265.111 and 3745-56-02.	___	___	X	_____
a) The facility has been closed within the time limits specified in Sections 265.113 and 3745-56-04.	___	___	X	_____
b) Upon completion of Closure all facility equipment and structures were decontaminated and any hazardous residues were properly disposed of (265.114 and 3745-56-05).	___	___	X	_____
c) Completion of Closure has been certified to the Regional Administrator by the Owner/Operator and an independent Professional Engineer (265.115 and 3745-56-06).	___	___	X	_____

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY DISPOSAL FACILITIES.

5. A written Post-Closure Plan is on file at the facility which describes all Post-Closure activities and addresses all of the plan elements required by Sections 265.118(a) and 3745-56-08-A.	___	___	X	_____
6. The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation.	___	___	X	_____
7. The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure.	___	___	X	_____
8. The Owner/Operator has submitted all of the information on prior use of the property required in Sections 265.119 and 3745-56-10 to the Local Land Authority within 90 days after Closure is completed.	___	___	X	_____

	Yes	No	N/A	Remark #
9. The property owner has attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under Sections 265.117(c) and 3745-56-08-C as required in Sections 265.120 and 3745-56-10.	___	___	X	_____

Subpart H: Financial Requirements

1. A written cost estimate for Closure of the facility (by the methods and procedures specified in the facility Closure Plan) is available for review on and after May 19, 1981 (Sections 265.142 and 3745-56-32).	X	___	___	_____

NOTE: REGULATIONS PROMULGATED IN 46 FR 2877-2892 IN REGARD TO FINANCIAL REQUIREMENTS HAVE BEEN STAYED UNTIL APRIL 13, 1982 AND MAY BE AMENDED OR REPROPOSED AT THAT TIME.

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

VI. Western Electric has determined which wastes are hazardous by applying their knowledge of the waste generated in the manufacturing process in light of the materials and processes used.

VII. Western Electric must have a written waste analysis plan containing all of the information required by 40 CFR Part 265.13(b).

VIII. The inspection plan documentation must include the date and time of inspections, the name of the inspector, and a notation of the observations and any remedial actions.

IX. Inspections of hazardous waste handling/loading areas must be documented.

X. The Contingency Plan must contain the addresses and phone numbers (office and home) of all persons qualified to act as emergency coordinator.

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

XI. A copy of the Contingency Plan must be submitted to all local police departments, fire departments, hospitals, and State emergency service authorities. The State emergency service authorities address is:

Ohio EPA, Division of Hazardous Materials
Attn: Mr. Tom Crepeau, Permits & Manifest Records Section
361 East Broad Street
Columbus, Ohio 43215

XII. Western Electric must maintain a written operating record containing all of the informations required by 40 CFR Part 265.73.

XIII. Western Electric must have a written Closure Plan containing all of the elements required by 265.112.

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	Yes	No	N/A	Remark #
1. Hazardous wastes are stored in closed containers which are in good physical condition and are compatible with the wastes stored in them (Sections 265.171, .172, .173 and 3745-56-51,-52-53).	X			
2. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).		X		No. 14

NOTE: FACILITIES OPTING FOR LONG TERM STORAGE ARE NOT REQUIRED TO MEET PRE-TRANSPORT LABELING REQUIREMENTS UNTIL THE CONTAINERS ARE ACTUALLY OFFERED FOR TRANSPORT AND ARE NOT REQUIRED TO AFFIX AN ACCUMULATION DATE. (SECTIONS 262 AND 3745-52)

	Yes	No	N/A	Remark #
3. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 Meters) from the property line and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17-B (physical separation, signs and safety) are met (265.176 and 3745-56).	X			
4. Incompatible waste materials are not placed in the same containers or put in contaminated containers unless it is done under completely controlled and safe conditions as specified in Sections 265.17(b) and 3745-55-17-B (Sections 265.177(a), (b) and 3745-56-57-A-B).			X	

	Yes	No	N/A	Remark #
5. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265.177 (C) and 3745-56-57-C).	___	X	___	_____

XIV. The weekly inspection of the container storage area must be documented.

OhioEPA

Re: Franklin County
OHD004282703
HWFAB 01-25-0620

July 29, 1982

Mr. C. W. Gerhard
Chief Environmental Control
Department 42650
Western Electric Company Incorporated
6200 East Broad Street
Columbus, Ohio 43213

Dear Mr. Gerhard:

On June 28, 1982, Western Electric was inspected by the Ohio Environmental Protection Agency to determine if it was in compliance with Federal/State Interim Status Hazardous Waste Regulations promulgated under the Resource Conservation and Recovery Act (RCRA, Public Law 94-580).

The enclosed inspection report is self-explanatory and contains recommendations for correcting the deficiencies found during the inspection. This office requests that you provide a written response, within thirty days, to the following deficiencies/comments contained in the enclosed inspection report:

PAGE	QUESTION NUMBER	REQUIREMENT
1-3	1	Ethanol Disposal
1-3	2	Part A Permit
2-1	4a	Manifest
4-1	2	Waste Analysis Plan
4-2	4, 4g	Inspection Plan
4-4	1c, 2	Contingency Plan
4-5	1, 1a, 1b, 1c, 1d	Operating Record
4-6	1e, 1h	Operating Record
4-8	1, 1a, 1b, 1c, 1d, 1e	Closure Plan
5-1	2	Management of Containers

Please call (614-466-6450) if you have any questions regarding the inspection or RCRA Regulations.

Sincerely,

Lundy J. Adelsberger
Environmental Scientist
Hazardous Materials
Central District Office

LJA/sc

cc: Ms. Kathleen Homer, SIO, U.S. EPA, Region V
cc: Mr. Bob Fragale, Technical Permits, HWFAB, C.O.
cc: Ms. Paula Cotter, Compliance Unit, DHMM, C.O.

Western Electric

P. A. Klisares
General Manager,
Columbus Works

6200 East Broad Street
Columbus, Ohio 43213
614 868-2345

June 22, 1981

U.S. ENVIRONMENTAL PROTECTION AGENCY
Enforcement Division
Water and Hazardous Materials Compliance Section
230 South Dearborn
Chicago, Illinois 60604

Dear Sir:

Per your letter of May 20, 1981, we are submitting information to document the action taken to bring the Columbus Works into compliance status with Resource Conservation and Recovery Act requirements. The following information indicates measures taken to correct the items as listed in your Notice of Violation:

ITEM 1 - Our waste analysis plan is being drafted using as a guide the "Test Methods for Evaluating Solid Waste" as defined by Waste Characterization Branch, U.S. Environmental Protection Agency.

Wastewater treatment sludge will be analyzed by our own laboratory and by outside laboratories. The segregated chemical residue we collect and dispose of in drums will be analyzed by our laboratory.

ITEM 2 - We have issued an order, J-23081, for the purchase of the required "Danger" signs for posting at our facility. Receival of these signs is expected by June 30, 1981.

ITEM 3 - We have initiated the draft of a comprehensive written inspection plan and schedule. This section will detail all necessary inspection elements as outlined in 40 CFR, Section 265.15. We have listed all process equipment in our waste treatment facility by identifying numbers which will be used to develop the inspection log.

Process equipment, containment structures, monitoring equipment, waste handling/loading areas, and facility structure shall be inspected by the operating organization. Our plant inspection group will inspect emergency equipment, alarms, and communication devices.

Should you have any questions, contact Mr. D. E. Howell, (614) 868-2903.

Sincerely,

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

5EWHME

P.A. Klisares, General Manager
Western Electric
6200 East Broad Street
Columbus, Ohio 43213

MAY 20 1981

RE: NOV, Western Electric
Columbus, Ohio OHD004282703

Dear Mr. Klisares:

Notice is hereby given that the United States Environmental Protection Agency (U.S. EPA) has determined that the above facility is in violation of a requirement of Subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended by the Quiet Communities Act of 1978. Specifically it has been determined that Western Electric is in violation of Section 3004 of RCRA (42 USC 6924).

On March 5, 1981, representatives of the Ohio Environmental Protection Agency inspected your facility at 6200 East Broad Street, Columbus, Ohio. The report is forwarded for your information. The purpose of this inspection was to determine your facility's compliance status with RCRA. The inspectors found that:

1. Your facility did not have a written waste analysis plan as required by 40 CFR 265.13(b).

2. Your facility did not have "Danger" signs posted at all of its entrances. This is a requirement of 40 CFR 265.14(c)

3. Your facility did not maintain a written inspection schedule for portions of your facility which are subject to inspection. This is in violation of 40 CFR 265.15.

You are hereby requested to provide documentation to this office, within 15 days after receipt of this Notice of Violation, informing us of action taken to correct these violations. Please address such documentation to U.S. Environmental Protection Agency, Enforcement Division, Attention: Water & Hazardous Materials Compliance Section, 230 South Dearborn, Chicago, Illinois 60604. If you have any questions, please contact Ralph Feeney at (312) 353-2114.

Very truly yours,

Kenneth A. Fenner, Chief
Water & Hazardous Materials
Enforcement Branch

Enclosure

cc: Ernest C. Neal, Chief
Office of Hazardous Materials Management
Ohio Environmental Protection Agency

bcc: Constantelos/Klepitsch
Lillstrom
Messenger/Brunet
Feeney
Ken Humphrey (OEPA)
Tim Lawrence (OEPA)

RFEENEY/td/5-7-81 5/12/81
Donaldson td
Messenger
Leder
Gromnicki 5/15
Fenner

called Brenda Lillstrom
5-13-81

RCRA INTERIM STATUS INSPECTION FORM

PART 1. GENERAL INFORMATION

U.S. EPA IDENTIFICATION NUMBER: | O | H | D | 0 | 0 | 4 | 2 | 8 | 2 | 7 | 0 | 3 |

Facility: Western Electric

Address: 6200 East Broad Street

City: Columbus State: Ohio Zip Code: 43213

Telephone: 614-868-2660 County: Franklin

Facility Operator: P.A. Klisares

Title: General Manager Telephone: 614-868-2345

Facility Owner: American Telephone and Telegraph

Address: 222 Broadway

City: New York State: New York Zip Code: 10038

Telephone: 212-571-2345 County:

Type of Ownership: X Private ____ Government

Date of Inspection: 3/5/81 Time of Inspection:

Advance Notification? ____ No (Start) 1:30 p.m.

X Yes: Called 11:00 a.m., 3/4/81 (Finish) 4:30 p.m.

Weather Conditions: Cloudy, 43°F

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	Dale Howell	Plant Engineer	614-868-2903
2.			
3.			
4.			

RCRA INTERIM STATUS INSPECTION FORM

INSPECTOR(S)

	(Name)	(Title)	(Telephone)
1.	Mr. Ken Humphrey, Ohio EPA	Hazardous Waste Scientist	614-466-6450
2.	Mr. Tim Lawrence, Ohio EPA	Hazardous Waste Task Force	614-462-6749
3.			
4.			

1. Type(s) of hazardous waste site activity:

   A. X Generation B. X Storage C. X Treatment

   D. _____ Disposal E. X Off-Site Transportation

2. Specific hazardous wastes handled at this facility (EPA HW#):

   a) Listed Wastes: F001, F002, F003, F005 (Spent Solvents), F006, F007, F008, F009 (Electroplating Wastes), F010 (Quenching Bath Sludge).

   b) Non-Listed Wastes: _____ I (D001) X C (D002) _____ R (D003) _____ T (D000)

   D002 (Ammonium Etching Solution)

3. Has this facility submitted a Part A Permit Application? X Yes ____ No

4. Does this facility store, treat or dispose of any hazardous waste from any off-site domestic sources?

   _____ Yes, See Remark # _____ X No

5. Does this facility store, treat or dispose of any hazardous waste from any foreign sources?

_____ Yes, See Remark # _____ X No

6. Does this facility transport hazardous waste materials off-site for itself or other generators?

_____ Yes, Part 263 applies X No

a) Applicable U.S. EPA I.D. Number _____

b) Ohio P.U.C.O. GR TRSF Number _____

REMARKS, PART 1. GENERAL INFORMATION

PART 2. GENERATOR REQUIREMENTS (Section 262)

	Yes	No	N/A	Remark #
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 in compliance with the requirements of Section 262.11.	X			
2. Does this facility generate any hazardous wastes that are excluded from regulation under Sections 261.4 (statutory exclusions) or 261.6 (recycle, reuse)?	X			No. 1
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10))?	X			No. 2
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a), (b) and the minimum number of copies required by Section 262.22.	X			
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20.	X			
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23.	X			
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a), (b).			X	No. 3
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40.	X			

	Yes	No	N/A	Remark #
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked accordance with applicable DOT regulations (Sections 262.30, 262.31 and 262.32(a)).	X			
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 Liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b).	X			No. 4
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33.	X			
6. The generator meets the following record-keeping and reporting requirements:				
a) The generator has submitted an annual report for all hazardous waste shipped off-site as required by Section 262.41(a).			X	No. 5
b) The generator has submitted an annual report for all hazardous waste treated, stored or disposed of on-site as required by Section 262.41(b) and in compliance with Section 265.71, when applicable.			X	No. 5
7. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50.			X	
8. If the generator elects to store hazardous waste on-site in containers or tanks for 90 days or less without a RCRA storage permit as provided under Section 262.34, the following requirements with respect to such storage are met:			X	No. 6
a) Containers: the waste is stored in closed containers which meet all applicable DOT pre-transport requirements for packaging, labeling and marking.			X	

	Yes	No	N/A	Remark #
b) The date that accumulation began is clearly marked on each container.	___	___	X	_____
c) The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174).	___	___	X	_____
d) Containers holding ignitable or reactive waste(s) are located at least 50 feet (15 Meters) from the property line, and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176).	___	___	X	_____
e) Tanks: the tank(s) are operated in compliance with the safety requirements of Section 265.17 and 265.192(b) and are equipped with a waste-feed cutoff or bypass system as required in Section 265.192 (d).	___	___	X	_____
f) Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192(c)).	___	___	X	_____
g) Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194).	___	___	X	_____
h) Weekly inspections are made of all tank construction materials and containment structures (265.194).	___	___	X	_____
9. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. (Sec. 262.34)	___	___	X	_____
10. The generator keeps all of the records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records. (Sec. 262.34)	___	___	X	_____

	Yes	No	N/A	Remark #
11. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Section 265.197). (Sec. 262.34)	___	___	X	_____

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) BE MET. COMPLETE THESE SECTIONS OF THE INSPECTION FORM UNDER "PART 3 - GENERAL INTERIM STATUS REQUIREMENTS (SECTION 265)."

REMARKS, PART 2. GENERATOR REQUIREMENTS

No. 1 Some spent solvents are reclaimed both on and off-site. A corrosive ammonium etching solution is also recycled.

No. 2 Some degreasing solvents are closed-loop recycled. All or part of the wastewater treatment plant operation may qualify as "totally enclosed" as defined in Section 260.10 (70) and explained in 45 FR 33218. The extent to which the operation is considered "totally enclosed" was not determined during the inspection.

No. 3 No manifest exception situations have occurred to date.

No. 4 The Label Master Manifest is used.

No. 5 The requirement for an annual report for Calendar Year 1980 has been suspended.

No. 6 All waste storage areas are operated under Interim Status (Long-Term Storage).

PART 3. GENERAL INTERIM STATUS REQUIREMENTS (Section 26)

SUBPARTS INCLUDED

1. Subpart B: General Facility Standards
2. Subpart C: Preparedness and Prevention
3. Subpart D: Contingency and Emergency
4. Subpart G: Closure for Non-Disposal Facilities

Subpart B: General Facility Standa ls

	Yes	No	N/A	Remark #
1. The facility meets all requirements under General Facility Standards in Section 265, Subpart B:				
a) The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Sec. 265.13(a)(1).	X			
b) The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Section 265.13(b)).		X		No. 7
c) If required due to the actual hazards associated with the waste material, the operator has prevented unauthorized access to the active portions of the facility and has provided the following features and equipment (Section 265.14).				
1. 24 hour surveillance system.	X			
2. Artificial or natural barrier completely surrounding the active portion of the facility.	X			
3. Controlled entry (gates, monitors) to the active portion of the facility at all times (265.14(2)(ii)).	X			
4. "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c)).		X		No. 8

	Yes	No	N/A	Remark #
d) The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. The plan includes the following elements: (Section 265.15)		X		No. 9
1. Inspect emergency equipment.	X			
2. Inspect monitoring equipment.	X			
3. Inspect security, alarm and communications devices.	X			No. 10
4. Inspect process equipment (pipes, pumps, etc.).	X			No. 11
5. Inspect containment structures (dikes, curbs, etc.).			X	
6. Inspect facility for structural malfunctions (roof, floor, etc.).	X			No. 12
7. Inspect hazardous waste handling/loading areas each day used.	X			No. 13
8. Record of any malfunctions due to equipment or operator errors.			X	
9. Record of any hazardous waste discharges.			X	
e) The facility has provided a Personnel Training Program in compliance with Section 265.16 (a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	X			
f) The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records.	X			

	Yes	No	N/A	Remark #
g) If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Section 265.17):	X			
1. Protection from sources of ignition.	X			
2. Physical separation of incompatible waste materials.	X			
3. "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	X			
4. Any co-mingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b).			X	

REMARKS, SEC. 265, SUBPART B

No. 7 A written waste analysis plan is not available.

No. 8 Once inside the main facility, the main waste storage areas could be accessed by unauthorized personnel. These areas are not separately fenced and the entrances leading to the storage areas are not equipped with "Danger" signs. All of the numerous controlled access ports to the main facility are also not equipped with "Danger" signs.

No. 9 The inspections required under Section 265.16 are not presently performed as a result of a written inspection plan (schedule).

No. 10 Only malfunctions are recorded.

No. 11 Security personnel make inspections, but do not document.

No. 12 The Plant Engineer performs this inspection formally once per year.

No. 13 These inspection are not documented.

PART 3. GENERAL INTERIM STATUS REQUIREMENTS

Subpart C: Preparedness and Prevention

	Yes	No	N/A	Remark #
2. The facility meets all requirements for Preparedness and Prevention in Section 265, Subpart C:				
a) Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31)	___	X	___	_____
b) If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32)	X	___	___	_____
1. Internal alarm system.	X	___	___	_____
2. Access to telephone, radio or other device for summoning emergency assistance.	X	___	___	_____
3. Portable fire control equipment.	X	___	___	_____
4. Water at adequate volume and pressure via hoses sprinklers, foamers or sprayers.	X	___	___	_____
c) All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented.	X	___	___	_____
d) If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled (Section 265.34)	X	___	___	_____
e) If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement of emergency or spill control equipment is maintained (265.35).	X	___	___	_____

	Yes	No	N/A	Remark #
f) If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout (265.37(a)).	X			No. 14
g) Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented (265.37(b)).			X	

Subpart D: Contingency and Emergency

	Yes	No	N/A	Remark #
3. The facility meets all requirements for Contingency Plan and Emergency Procedures in Section 265, Subpart D.				
a) The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51) and contains the following components:		X		No. 15
1. Actions to be taken by personnel in the event of an emergency incident.	X			
2. Arrangements or agreements with local or state emergency authorities.		X		No. 14
3. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	X			No. 16
4. A list of all emergency equipment including location, physical description and outline of capabilities.		X		No. 17
5. If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel (Section 265.51(f)).	X			

	Yes	No	N/A	Remark #
b) A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (Section 265.53)	___	X	___	No. 14
c) The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54).	X	___	___	___
d) An emergency coordinator is designated at all times (on-site or on-call), is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Section 265.55).	X	___	___	No. 18
e) If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Section 265.56.	___	___	X	___

REMARKS, SEC. 265, SUBPARTS C AND D

No. 14 The Local Fire Department has been contacted in regard to some of the hazardous raw materials used at this facility, but no formal arrangement regarding the RCRA waste materials has been made.

No. 15 The Western Electric Facility is quite large, and the hazardous wastes and hazardous waste storage areas do not figure prominently in the existing facility Contingency Plan.

No. 16 The facility is so large that the main designated emergency coordinator acts in a management capacity and is not actually familiar with all of the details of the plan. Department Chiefs are to be contacted for implementation of plan details.

No. 17 This information is contained in a separate document maintained by Plant Security personnel.

No. 18 The existing plan needs to be more specific in regard to the RCRA requirements.

PART 3. GENERAL INTERIM STATUS REQUIREMENTS (Section 265)

Partial Subpart G: Closure For Non-Disposal Facilities (Section 265.110(a))

	Yes	No	N/A	Remark #
4. The facility meets all applicable closure requirements under Section 265, Subpart G for Non-Disposal Facilities:	___	___	X	No. 19
a) A written closure plan is on file at the facility and contains the following elements: (Section 265.112)				
1. A description of how and when the facility will be closed (265.112(a)(1).	___	___	X	___
2. A description of how any of the applicable closure requirements in other subparts of Section 265 (Tanks-265.197, Surface Impoundments-265.228) will be implemented.	___	___	X	___
3. An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.	___	___	X	___
4. A description of steps taken to decontaminate facility equipment.	___	___	X	___
5. A list of dates over which the various phases of closure are expected to be completed.	___	___	X	___
b) The closure plan has been amended, if necessary, in response to changes in facility design or processes.	___	___	X	___
c) The closure plan has been submitted to the regional administrator 180 days prior to beginning the closure process.	___	___	X	___
d) The facility has been closed within the time limits specified by Section 265.113.	___	___	X	___
e) Upon completion of closure all facility equipment and structures were decontaminated and any hazardous residues were properly disposed of (265.114).	___	___	X	___

	Yes	No	N/A	Remark #
f) Completion of closure has been certified to the regional administrator by the owner/ operator and an independent Professional Engineer (265.115).	___	___	X	_____
g) The facility has been closed in a manner which minimizes any future problems (265.111).	___	___	X	_____

REMARKS, PART 3. SUBPART G, CLOSURE

No. 19 A Closure Plan is not required until May 19, 1981.

PART 4. LONG-TERM STORAGE REQUIREMENTS (Section 265)

SUBPARTS INCLUDED

1. Subpart I: Management of Containers
2. Subpart J: Management of Tanks
3. Subpart K: Surface Impoundments
4. Subpart L: Waste Piles

Subpart I: Management of Containers

	Yes	No	N/A	Remark #
1. The facility meets all requirements for Management of Containers in Section 265, Subpart I:	___	X	___	No. 20
a) Hazardous wastes are stored in closed containers which are in good physical condition and are compatible with the wastes stored in them (Section 265.171, .172, .173).	X	___	___	___
b) The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174).	X	___	___	No. 21

NOTE: FACILITIES OPTING FOR LONG TERM STORAGE ARE NOT REQUIRED TO MEET PRE-TRANSPORT LABELING REQUIREMENTS UNTIL THE CONTAINERS ARE ACTUALLY OFFERED FOR TRANSPORT AND ARE NOT REQUIRED TO AFFIX AN ACCUMULATION DATE. (SECTION 262).

c) Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176).	X	___	___	___
d) Incompatible waste materials are not placed in the same containers or put in contaminated containers unless it is done under completely controlled and safe conditions as specified in Section 265.17(b). (Section 265.177(a)(b).	X	___	___	___
e) Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner (Section 265.177(c)).	X	___	___	___

PART 4. LONG-TERM STORAGE REQUIREMENTS (Section 265)

Subpart J: Storage in Tanks

	Yes	No	N/A	Remark #
2. The facility meets all requirements for storage in tanks in Section 265 Subpart J:	___	___	X	___
a) The tank(s) are operated in compliance with the safety requirements of Section 265.17 and 265.192(b) and are equipped with a waste-feed cutoff or bypass system as required in Section 265.192(d).	___	___	X	___
b) Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c)).	___	___	X	___
c) Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194).	___	___	X	___
d) Weekly inspections are made of all tank construction materials and containment structures (265.194).	___	___	X	___
e) Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (Section 265.193(a)).	___	___	X	___
1. A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.	___	___	X	___
2. Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.	___	___	X	___

No. 20 The hazardous waste container storage areas are not separately fenced and equipped with "Danger-Authorized Personnel Only" signs. The entire large plant is fenced and has controlled access. Gates and entrances in the outer perimeter fence are not all equipped with "Danger" signs.

No. 21 The inspections are performed but are not documented.

	Yes	No	N/A	Remark #
f) With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods, (Section 265.198 (a):	___	___	X	_____
1. The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Section 265.17 (b).	___	___	X	_____
2. The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.	___	___	X	_____
g) Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code-1977) (Section 265.198(b)).	___	___	X	_____
h) Incompatible waste materials are not placed in the same tanks or put in contaminated tanks unless it is done under completely controlled and safe conditions as specified in Section 265.17(b) (Section 265.199).	___	___	X	_____
j) Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Section 265.197).	___	___	X	_____

REMARKS, PART 4 SUBPART J- TANKS

PART 4. LONG-TERM STORAGE REQUIREMENTS (Section 265)

Subpart K: Surface Impoundments

	Yes	No	N/A	Remark #
3. The facility meets all requirements for management of wastes in Surface Impoundments in Section 265, Subpart K:	___	___	X	___
a) The Surface Impoundment is designed to operate with at least 2 feet (60 cm.) of freeboard and has a structural containment system adequate to contain the waste material (Section 265.222).	___	___	X	___
b) Earthen structural containment systems are equipped with protective cover such as grass, shale or rock to minimize erosion from wind and water (265.22).	___	___	X	___
c) The level of freeboard in the Surface Impoundment is inspected at least once each operating day, the structural containment system is inspected at least once per week and all such inspections are documented (Section 265.226).	___	___	X	___
d) Has the facility ever recorded an unplanned release of hazardous waste from the Surface Impoundment(s)? (Section 265.15)	___	___	X	___
e) Whenever Surface Impoundments are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the Surface Impoundment, the facility has insured the safety of such changes by one or both of the following methods (265.225):	___	___	X	___
1. A complete waste analysis plus bench scale or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.	___	___	X	___
2. Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.	___	___	X	___

	Yes	No	N/A	Remark #
f) With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in Surface Impoundments the facility has insured the safety of the operation by the following method (Section 265.229):	___	___	X	_____
1. The waste is treated immediately after placement in the Surface Impoundment so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Section 265.17(b).	___	___	X	_____
g) Incompatible materials are never placed in the same Surface Impoundment unless it is done in compliance with the safety requirements of Section 265.17(b) (Section 265.230).	___	___	X	_____
h) As required by Subpart F, Section 265.90, (Ground Water Monitoring) the facility has implemented a ground water monitoring program capable of determining the impact of the Surface Impoundment(s) on the quality of the gound water in the uppermost aquifer underlying the facility.	___	___	X	_____
j) In lieu of a ground water monitoring program, the operator has a written demonstration that there is a low potential for migration of hazardous waste or constituents via ground or surface waters which has been certified in writing by a qualified geologist in compliance with Section 265.90(c).	___	___	X	_____
k) Upon closure of the Surface Impoundment, the operator intends to remove all wastes, residues, liners and any contaminated soil as required by Section 265.228 in order to exempt the Surface Impoundment from further regulation under Section 265.	___	___	X	_____

NOTE: IF THE OPERATOR ELECTS NOT TO EXEMPT THE SURFACE IMPOUNDMENT FROM FURTHER REGULATION BY REMOVING ALL WASTE MATERIALS, THE SURFACE IMPOUNDMENT IS SUBJECT TO THE POST-CLOSURE CARE AND GROUNDWATER MONITORING REQUIREMENTS SPECIFIED IN SUBPART G FOR DISPOSAL FACILITIES AND SUBPART N, SECTION 265.310 FOR LANDFILLS. (SECTION 265.228(e).

PART 4. LONG-TERM STORAGE REQUIREMENTS (Section 265)

Subpart L: Storage in Waste Piles

	Yes	No	N/A	Remark #
4. The facility meets all requirements for storage in Waste Piles in Section 265, Subpart L:	___	___	X	___
a) Waste materials which are subject to dispersal by wind have been adequately protected against such dispersal (Section 265.251).	___	___	X	___
b) If leachate or runoff from a Waste Pile would be a hazardous waste, then one or more of the following steps have been taken to prevent or properly manage the situation (Section 265.253).	___	___	X	___
1. The pile has been placed on an impermeable base, run-on has been diverted away from the pile and any leachate or runoff is collected and managed as a hazardous waste.	___	___	X	___
2. The pile has been protected from precipitation and run-on in a manner which prevents the generation of leachate and runoff.	___	___	X	___
3. No liquids or wastes containing free liquids are placed in the pile.	___	___	X	___
c) No new waste materials are added to an existing Waste Pile without first ascertaining that the material is compatible with the existing waste by conducting appropriate laboratory tests, which are documented in the facility operating record (Section 265.252).	___	___	X	___
d) Ignitable or Reactive waste materials are not placed in Waste Piles unless one or both of the following conditions are met (Section 265.256):	___	___	X	___

	Yes	No	N/A	Remark #
1. The addition to the pile results in a mixture which no longer meets the definition of Ignitable or Reactive and was done in compliance with the safety requirements of Section 265.17(b).	___	___	X	_____
2. The Ignitable or Reactive material is physically or otherwise protected from conditions which may cause ignition or reaction.	___	___	X	_____
e) Incompatible materials are never placed in the same Waste Pile or near areas containing residues of a incompatible material unless it is done in compliance with the safety requirements of Section 265.17(b) (Section 265.257(a)(c).	___	___	X	_____
f) Piles of hazardous waste are never stored near other materials which may interact with the waste in a hazardous manner (Section 265.257(b).	___	___	X	_____

REMARKS, PART 4 - SUBPART L, WASTE PILES

D. Corrective Action

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR 0 5 2007

REPLY TO THE ATTENTION OF: DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

OHD004282703
LUCENT TECHNOLOGIES
6200 E BROAD ST
COLUMBUS, OH 43213

RE: OHD004282703
LUCENT TECHNOLOGIES

Dear Plant Manager/President:

The Ohio Environmental Protection Agency (OEPA) and the United States Environmental Protection Agency (U.S. EPA) have compiled a list of all facilities deemed appropriate and important to address using the Resource Conservation and Recovery Act's (RCRA) Corrective Action Program. Because this set of 3,880 facilities has national remediation goals which will culminate in the year 2020, it is referred to as the 2020 Corrective Action Universe. **Your facility is part of this 2020 Universe.**

As a result, the OEPA and U.S. EPA expect that a final remedy will be in place (i.e. remedy construction completed) at your facility by 2020 (although actual attainment of cleanup goals through remedy implementation may take a while longer). If we have not already done so, we will be working with you to develop a plan and a schedule that achieves this goal before 2020.

Your facility has been included in the 2020 Universe because ***one or more of the following is true:***

- It already belongs to the 2008 Corrective Action Baseline,
- It has a RCRA permit obligation,
- OEPA and U.S. EPA agreed that it needs to be addressed under the RCRA Corrective Action Program.

Inclusion on this list does not imply failure on your part to meet any legal obligation, nor should it be construed as an adverse action against you. It only means that OEPA and U.S. EPA have identified your facility—and every other facility in the 2020 Universe—as needing to complete RCRA Corrective Action if they have not done so already. Our national program goal is to largely address these cleanup obligations before the end of 2020. Accordingly, progress will be tracked for each facility in the 2020 Universe. The list of facilities will be posted on our web site at http://www.epa.gov/correctiveaction on April 16, 2007.

U.S. EPA Region 5 will work to address remediation concerns at your facility in a manner consistent with your plans for the property. If you believe that facility-wide corrective actions are already complete for your site, or if you have any questions regarding this letter, please contact George Hamper at (312) 886-0987.

Sincerely,

Jose G. Cisneros, Chief
Waste Management Branch

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

April 21, 1993

Mr. Dale Howell
Environmental Engineer
American Telephone and Telegraph
6200 East Broad Street
Columbus, Ohio 43213

Re: Visual Site Inspection
American Telephone and Telegraph
Columbus, Ohio
OHD 004 282 703

Dear Mr. Howell:

The U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

PRC

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

AMERICAN TELEPHONE AND TELEGRAPH COLUMBUS, OHIO OHD 004 282 703

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	OHD 004 282 703
Date Prepared	:	March 29, 1993
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087OH6Z
Prepared by	:	PRC Environmental Management, Inc. (Margaret Flaherty)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the American Telephone and Telegraph (AT&T) facility (EPA Identification No. OHD 004 282 703) in Columbus, Ohio. The PA was completed on December 8, 1992. PRC gathered and reviewed information from the Ohio Environmental Protection Agency (OEPA) and from EPA Region 5 RCRA files. Information was also provided by the Federal Emergency Management Agency (FEMA) and U.S. Geological Survey (USGS) maps. The VSI was conducted on December 15 and 16, 1992. It included interviews with facility representatives and a walk-through inspection of the facility. PRC identified 22 SWMUs and 1 AOC at the facility.

EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to ntify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the American Telephone and Telegraph (AT&T) facility located at 6200 East Broad Street in Columbus, Franklin County, Ohio. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from the SWMUs and AOC identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritizing RCRA facilities for corrective action.

The AT&T facility manufactures cellular telephone network switching systems as well as computer-based and data networking systems. It also manufactures and assembles electromechanical and electronic telephone switching equipment, including cross bar switching systems, electronic switching systems, small metal and plastic parts, and local cable network switching equipment. The following industrial processes are conducted at the facility: machining, degreasing, electroplating, wastewater treatment, circuit board assembling, soldering, painting, plastic injection molding, and painting. In the future, the AT&T facility plans to expand its production of cellular systems products and eliminate its production of more traditional switching systems that require plastic injection molding and electroplating operations. The facility plans to cease all electroplating, wastewater treatment, and plastic injection molding operations by the end of 1993.

The following waste streams are generated at the AT&T facility:

- Pretreated process wastewater
- Concentrated waste acid and sodium hydroxide
- Wastewater treatment sludge (F006)
- Waste chromic acid residue (D001, D002, and D007)
- Waste sodium hydroxide residue (D002 and D007)
- Waste zinc cyanide residue (F008)
- Zinc and copper plating filters (F008)
- Nickel chloride residue
- Waste solder dross (D008)
- Waste solder paste (D008)

- Waste alcohol (F003 and F005)
- Waste 1,1,1-trichloroethane (1,1,1-TCA) (F002)
- Waste butyl carbitol (F002)
- Trichloroethylene (TCE) still bottoms (F001)
- Waste paint (F005)
- Used oil
- Light ballasts containing polychlorinated biphenyls (PCB)

The facility has operated at its current location since 1959. The facility occupies 253 acres in a mixed-use area and employs about 6,200 people. The facility is currently regulated as a large-quantity generator of hazardous waste.

The facility filed a Part A permit application to operate as a storage facility. In November 1982, EPA approved closure of the facility's Original Container Storage Area (SWMU 19) and the Former Cyanide and Acid Waste Storage Area (SWMU 20). Closure of these units changed the facility's status to that of a generator only.

The PA/VSI identified the following 22 SWMUs and 1 AOC at the facility:

Solid Waste Management Units

1. Wastewater Pretreatment System
2. Concentrated Waste Tanks
3. Wastewater Treatment Sludge Roll-Off Box
4. Electroplating Collection Pits
5. Container Storage Area
6. Solder Dross Accumulation Area I
7. Solder Dross Accumulation Area II
8. Solder Dross Accumulation Area III
9. Solder Paste Accumulation Area
10. Flammable and Nonflammable Waste Accumulation Area
11. 1,1,1-TCA Vapor Cleaner Waste Accumulation Area
12. Freon Vapor Cleaner Waste Accumulation Area
13. 1,1,1-TCA Parts Washers Waste Accumulation Area
14. TCE Still and Still Bottoms Accumulation Area
15. Paint Waste Accumulation Area
16. Molding Machines Used Oil Accumulation Area
17. Boiler House Used Oil Accumulation Area
18. Tool Room Used Oil Accumulation Area
19. Original Container Storage Area
20. Former Cyanide and Acid Waste Storage Area
21. Former Waste Ammonia Etching Solution Tank

22. Former Waste Alcohol Evaporation Pond

Area of Concern

1. Ground-water Contamination

Ground-Water Contamination (AOC 1) has been documented at the AT&T facility. Ground-water samples collected in 1982, 1983, and 1984 from a collection drain that extends around the foundation of the boiler house, on-site monitoring wells, and standpipes used as wells confirmed the presence of 1,1,1-trichloroethane (1,1,1-TCA); trichloroethylene (TCE); and tetrachloroethylene (PCE) in the ground water. A Phase I and a Phase II hydrogeologic investigation conducted at the AT&T facility by Burgess and Niple (B&N) concluded that ground-water contamination beneath the AT&T facility was due to on-site sources. The Phase I hydrogeologic investigation report cited the facility's, underground pipelines, aboveground solvent pumps, and the Former Waste Alcohol Evaporation Pond (SWMU 22) as potential sources of contamination. The report also cited the facility's former underground storage tanks (UST) as a potential source of contamination. However, according to facility representative, Dale Howell, only No. 2 fuel oil was stored in USTs.

Five incidences of air permit exceedence were reported by AT&T to the Ohio Environmental Protection Agency (OEPA). These incidences occurred between December 1987 and October 1988. These five reported incidences resulted from the release of PCE from the facility in exceedence of permitted allowable limits. The OEPA Air Pollution Control Division has issued 25 operating air permits for machines used throughout the AT&T facility.

The potential for a release to on-site soils and ground water from the Former Waste Alcohol Evaporation Pond (SWMU 22) is high. SWMU 22 was located in the northern half of the facility, along the eastern property line. It consisted of a depression, about 15 feet in diameter, in an open field. Waste alcohol was disposed of in SWMU 22. This unit was used from 1959 until about 1978 and had no release controls. The past potential for a release to air from this unit was high. In addition, SWMU 22 was not lined. Although alcohol is very volatile; this unit had no release controls to prevent waste alcohol, or other constituents that may have been present in the waste alcohol, from migrating to on-site soils and ground water.

The potential for a release to surface water from the Former Waste Alcohol Evaporation Pond (SWMU 22) is low to moderate. If residual contamination exists in the on-site soils, the contaminants could potentially migrate to ground water and downgradient surface water bodies.

The potential for a release to ground water, surface water, on-site soils and air from the remaining SWMUs is low. All of the active SWMUs, except for the Container Storage Area (SWMU 5) and a portion of the Wastewater Pretreatment System (SWMU 1), are indoors. SWMU 1 is inspected annually and the flow in and out of this unit is constantly monitored. SWMU 5 is equipped with a collection trench and is surrounded by concrete curbing.

The nearest receptors to a release at the AT&T facility include AT&T's 6,200 employees. The nearest residence is about 0.25 mile south of the facility. Facility access is controlled by 24-hour security, and a 6-foot chainlink fence completely encloses the facility. Ground water is not a primary source of drinking water in the vicinity of the AT&T facility. The city of Columbus supplies water to the AT&T facility and nearby residences. This municipal water supply is obtained from three reservoirs, the closest of which is Hoover Reservoir located along Big Walnut Creek about 7 miles upstream of the AT&T facility.

The nearest surface water body, Blacklick Creek, is located about 0.5 mile east of the facility and is used for recreational purposes. A larger surface water body, also used for recreational purposes, is Big Walnut Creek located about 1 mile west of the facility. Sensitive environments are not located on-site. Gahana Woods is a wet meadow wetland consisting of shallow wet marshes and low trees located about two miles northeast of the facility. Gahana Woods is about 7 acres in size. Several smaller wetlands, between 1 and 2 acres in size, are located within 2 miles of the AT&T facility.

PRC recommends that soil samples be collected in the area of the Former Waste Alcohol Evaporation Pond (SWMU 22). These samples should be analyzed for volatile organic compounds (VOC). If soil contamination is detected, ground-water samples should also be collected and analyzed for VOCs.

PRC also recommends that ground-water samples be collected from the boiler house collection drain, six on-site monitoring wells, and two on-site stand pipes used as monitoring wells. These samples should also be analyzed for VOCs. If Ground-water Contamination

(AOC 1) is detected, soil sampling should be conducted around the boiler house to further define the source of the contamination and the extent of the contamination.

PRC completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and 30 inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; a history of documented releases; regulatory history; environmental setting; and receptors.

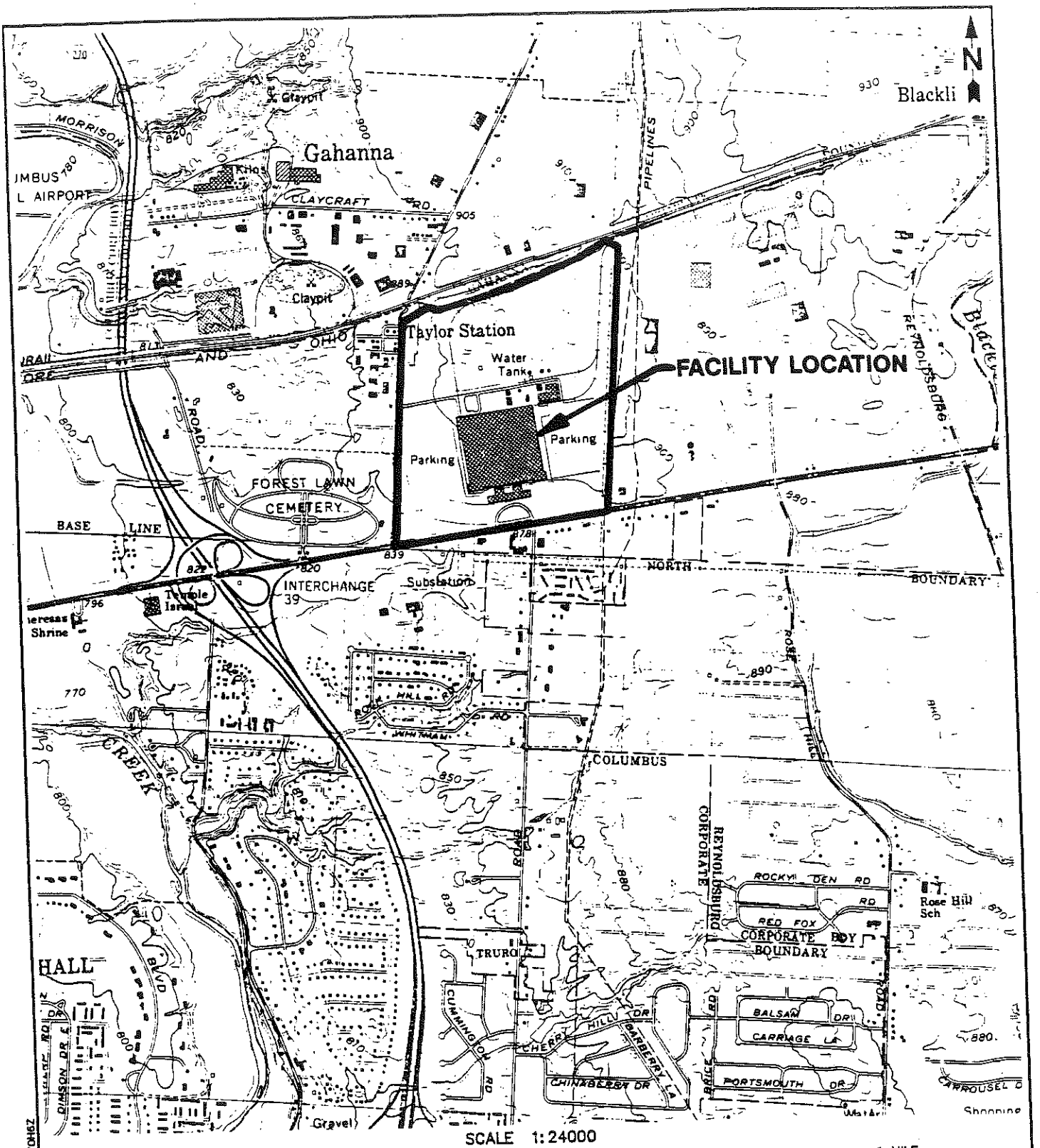
2.1 FACILITY LOCATION

The AT&T facility is located at 6200 East Broad Street in the city of Columbus, Franklin County, Ohio (latitude 39°38'30" N and longitude 82°50'16" W), as shown in Figure 1. The facility occupies 253 acres in a mixed-use area.

The AT&T facility is bordered on the northwest by the Bedford I Landfill, located about 0.5 mile from the facility, and the Bedford II Landfill, located about 1 mile from the facility; on the northeast by Columbus Steel Drums; on the east by an industrial complex consisting of various warehouses and an aluminum can manufacturing company; on the south by a commercial plaza and the Mount Carmel Medical Complex; and on the west by the Forest Lawn Cemetery.

2.2 FACILITY OPERATIONS

The facility has operated at its current location since 1959 and employs about 6,200 people. The AT&T facility manufactures cellular telephone network switching systems as well as computer-based and data networking systems. It also manufactures and assembles electromechanical and electronic telephone switching equipment, including cross bar switching systems, electronic switching systems, small metal and plastic parts, and local cable network switching equipment. The following industrial processes are conducted at the facility: machining, degreasing, electroplating, wastewater treatment, circuit board assembling, soldering, painting, plastic injection molding, and painting. In the future, the AT&T facility plans to expand its production of cellular systems products and eliminate its production of more traditional switching systems that require plastic injection molding and electroplating operations. The facility plans to cease all electroplating, wastewater treatment, and plastic injection molding operations by the end of 1993.



SOURCE: MODIFIED FROM USGS, REYNOLDSBURG, OHIO QUADRANGLE, 1985

AT&T
COLUMBUS, OHIO

FIGURE 1

FACILITY LOCATION

PRC ENVIRONMENTAL MANAGEMENT, INC

ATT-TECH.DWG - 01/07/93 - MLB 009-C05087OH62

All production processes take place in one main manufacturing building. However, there are other buildings on site, including a wastewater treatment building, a maintenance building, and a boiler house in which steam is generated for the plastic molding operations. The facility has several aboveground tanks located outdoors, including two 375,000-gallon steel tanks used to store No. 2 fuel oil and one 500,000-gallon steel tank used to store water obtained from the city of Columbus. A covered outdoor tank farm has two 15,000-gallon steel tanks that hold a solution of 20 percent sodium hydroxide, one 8,000-gallon fiberglass tank containing hydrochloric acid (HCl), and one 6,000-gallon steel tank containing trichloroethylene (TCE). These tanks were installed in 1988. According to the facility representative, Dale Howell, no underground storage tanks (UST) are currently located at the facility. The facility has two main parking lots on the southern half of the facility. An open field and a recreational area comprise the northern half of the facility property.

The facility has operated an on-site Wastewater Pretreatment System (SWMU 1) to treat electroplating wastes since facility operations began in 1959. Various chemicals, including chlorine and sulfur dioxide, are used during wastewater treatment. These chemicals are stored in the wastewater treatment building.

Prior to 1957, the property consisted of farmland. The Western Electric Company (Western Electric) purchased the property and began construction of the facility in 1957. Bell Telephone Laboratories (Bell Laboratories) joined Western Electric at the facility when operations began in 1959. In 1982, Western Electric was divided and facility ownership was assumed by AT&T Network Systems. In 1989, AT&T assumed ownership of the facility.

Since 1959, Bell Laboratories has conducted research for AT&T at the facility. From 1959 until 1990 Bell Laboratories used its own plating system to conduct electroplating research. Electroplating wastes generated by Bell Laboratories were managed in the Wastewater Pretreatment System (SWMU 1). In 1990, the electroplating system used by Bell Laboratories was removed by Chemical Waste Management. Bell Laboratories currently develops and tests computerized software for AT&T.

In the past, facility operations included copper and aluminum etching, and gold plating, which occurred during circuit board manufacturing. These operations began in 1968 and ceased in September 1986. Two gold platers, a nickel and chrome plater, and two zinc platers were removed from the facility in 1986. An inactive automatic nickel plater, which is still present at

the facility, was used until March 1991. From 1959 until June 1992, the facility also manufactured fuses.

2.3 WASTE GENERATION AND MANAGEMENT

This section describes the generation and management of wastes at the AT&T facility. The facility's SWMUs are identified in Table 1. The facility layout, including SWMUs and an AOC, is shown in Figures 2-A and 2-B. The facility's waste streams are summarized in Table 2.

The primary waste streams generated at the AT&T facility are TCE still bottoms (F001); waste 1,1,1-TCA (F002); pretreated process wastewater; wastewater treatment sludge (F006); concentrated waste acid and sodium hydroxide; waste chromic acid residue (D001, D002, and D007); waste sodium hydroxide residue (D002 and D007); waste zinc cyanide residue (F008); zinc and copper plating filters (F008); nickel chloride residue; waste solder dross (D008); waste solder paste (D008); waste alcohol (F003 and F005); waste paint (F005); waste butyl carbitol (F002); used oil; and light ballasts containing polychlorinated biphenyls (PCB). Annual generation rates presented in the following paragraphs are based on 1989 and 1991 waste generation data.

Punch presses are used at the facility to fabricate small metal parts. The metal parts are used as relays in the manufacture of switching systems. Punch press operations generate scrap metal, which is accumulated in 25 cubic yard roll-off boxes at the Container Storage Area (SWMU 5). The scrap metal is taken off site to local recycling centers.

After fabrication, metal relay parts are finished using barrel tumblers or an electrochemical grinding process. Relay parts are placed in barrel tumblers along with stones. Rough edges of metal relay parts are made smooth by repeated collisions with stones. Two electrochemical grinders are also used to finish metal relay parts. The grinders contain a salt solution. An electric current is run through the salt solution to grind the metal parts. Spent salt solution generated in the grinders is discharged to the Wastewater Pretreatment System (SWMU 1).

Following metal finishing operations, relay parts are cleaned using a 1,400-gallon trichloroethylene (TCE) vapor degreaser. Spent TCE is piped to the TCE Still and Still Bottoms Accumulation Area (SWMU 14) for recovery. Waste TCE still bottoms (F001) are piped from the still into the 550-gallon tank, and then pumped into the 55-gallon drum. When filled, the drum is taken from the TCE Still and Still Bottoms Accumulation Area (SWMU 14) to the Container

Storage Area (SWMU 5) for less than 90-day storage. The waste is transported off site to the Safety-Kleen Corporation (S-K) recycling facility in Hebron, Ohio. AT&T generates about 850 pounds of waste TCE still bottoms annually (AT&T, 1992b).

One vapor cleaner containing 1,1,1-TCA is also used to clean surface dirt from metal relay parts. Prior to July 1992, this unit contained freon; after July 1992, the unit contained 1,1,1-TCA (AT&T, 1992b). Waste 1,1,1-TCA (F002) from the vapor cleaner is accumulated in an adjacent 55-gallon drum. When full, the drum is moved from the 1,1,1-TCA Vapor Cleaner Waste Accumulation Area (SWMU 11) to the Container Storage Area (SWMU 5) for less than 90-day storage. The waste is transported off site to the S-K recycling facility in Hebron, Ohio. The facility generates about 5,800 gallons of waste 1,1,1-TCA annually (AT&T, 1992b).

After being cleaned, metal relay parts are electroplated using one of the following electroplating systems: a programmable hoist plater for copper-plating, nickel-plating, and zinc-plating; an automatic nickel and chrome plater; and an acid-tin barrel plater. The programmable hoist plater consists of 33 tanks containing various chemicals and solutions, including HCl; chrome rinses; copper and cyanide rinses; HCl and nitric acid rinses; nickel-, copper-cyanide-, and zinc cyanide-plating solutions; and sodium hydroxide rinsing solutions. The automatic nickel and chrome plater consists of nine tanks containing nickel and chrome plating solutions, sodium hydroxide cleaning solutions, nitric acid, and HCl. The acid-tin barrel plater consists of 10 tanks containing HCl, sulfuric acid, an HCl rinsing solution, a nitric and sulfuric acid mix, and a tin-plating solution.

Pre-masked circuit boards purchased by AT&T are also electroplated at the facility. The circuit boards are masked with a coating that allows metals to be electroplated to the circuit boards in specific patterns. Circuit boards are electroplated using one of the three systems discussed above.

Process wastewaters generated by electroplating operations are treated on site in the facility's Wastewater Pretreatment System (SWMU 1). The following three piping networks are used to continuously transfer wastewater from the electroplating systems to SWMU 1: the dilute acid and alkali (DAA) piping network, the dilute chromate rinse piping network, and the dilute cyanide rinse piping network.

Dilute acid and dilute sodium hydroxide rinses are continuously fed into the Wastewater Pretreatment System (SWMU 1) through the DAA piping network. Spent salt solution generated through electrochemical grinding is also discharged to SWMU 1 via the DAA piping network. All wastes carried through the DAA piping network are discharged to a 19,000-gallon acid and alkali surge tank at SWMU 1.

Dilute chromate rinses are carried through their own piping network and discharged to a 7,100-gallon chromate surge tank. The chromate rinses are then treated in a 5,000-gallon sulfur dioxide tank in the Wastewater Pretreatment System (SWMU 1), pumped to a 6,300-gallon tank adjacent to the chromate surge tank, and gradually fed into the acid and alkali surge tank. Dilute cyanide rinses are discharged from the cyanide piping network into a 12,000-gallon tank at SWMU 1. The cyanide rinses are then pumped to and treated in a 5,000-gallon chlorine tank in SWMU 1, and gradually fed into the acid and alkali surge tank.

Wastewater from the acid and alkali surge tank is neutralized using cationic and anionic polymers in a series of four tanks. Once neutralized, the wastes are pumped into a 140,000-gallon clarifier at SWMU 1. The 140,000-gallon clarifier replaced a 40,000-gallon clarifier in 1971. Once in the clarifier, particles flocculate and settle out, and sludge accumulates on the clarifier bottom. Wastewater is discharged from the clarifier to the city of Columbus sanitary sewer system and ultimately to the city of Columbus wastewater treatment facility. The Wastewater Pretreatment System (SWMU 1) treats and discharges approximately 75,000 gallons of wastewater per day.

About every 15 minutes, sludge is pumped from the bottom of the clarifier into a 20,000-gallon holding tank. From the holding tank, the sludge is pumped to a filter press that has a capacity of 2.1 cubic yards. Once in the filter press, excess water is squeezed out of the sludge and pumped back into the fourth neutralization tank of the Wastewater Pretreatment System (SWMU 1). Wastewater treatment sludge (F006) is dropped from the filter press into the Wastewater Treatment Sludge Roll-Off Box (SWMU 3). When full, this box is transported by Chemical Waste Management to the Adams Center Landfill in Fort Wayne, Indiana. The facility generates about 142 tons of F006 wastewater treatment sludge annually (AT&T, 1992a).

TABLE 1

SOLID WASTE MANAGEMENT UNITS

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit[a]	Status
1	Wastewater Pretreatment System	No	Active
2	Concentrated Waste Tanks	No	Active
3	Wastewater Treatment Sludge Roll-Off Box	No	Active
4	Electroplating Collection Pits	No	Active
5	Container Storage Area	No	Active, less than 90-day storage area
6	Solder Dross Accumulation Area I	No	Active
7	Solder Dross Accumulation Area II	No	Active
8	Solder Dross Accumulation Area III	No	Active
9	Solder Paste Accumulation Area	No	Active
10	Flammable and Nonflammable Waste Accumulation Area	No	Active
11	1,1,1-TCA Vapor Cleaner Waste Accumulation Area	No	Active
12	Freon Vapor Cleaner Waste Accumulation Area	No	Active
13	1,1,1-TCA Parts Washers Waste Accumulation Area	No	Active

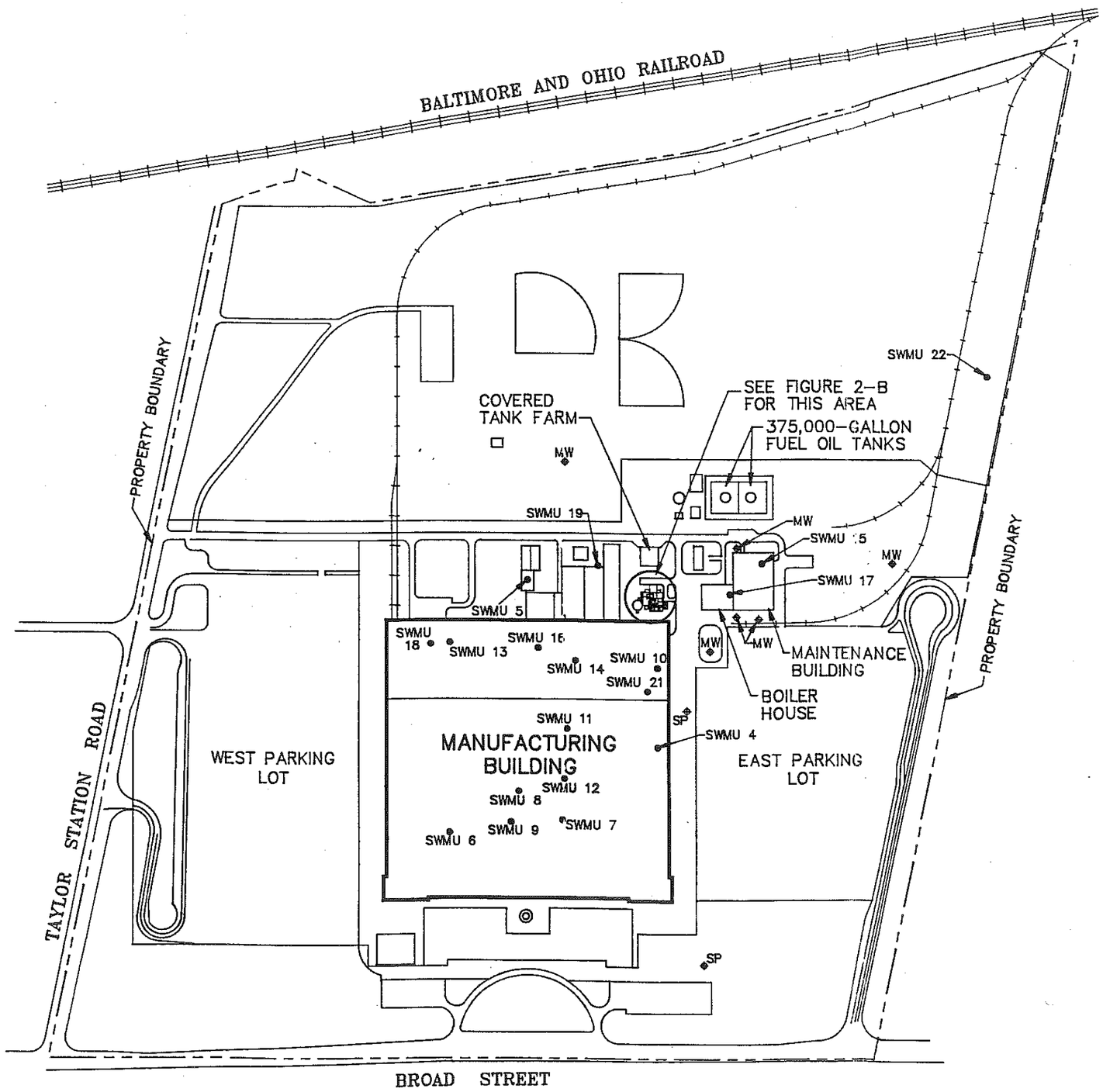
TABLE 1 (Continued)

SOLID WASTE MANAGEMENT UNITS

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit[a]	Status
14	TCE Still and Still Bottoms Accumulation Area	No	Active
15	Paint Waste Accumulation Area	No	Active
16	Molding Machines Used Oil Accumulation Area	No	Active
17	Boiler House Used Oil Accumulation Area	No	Active
18	Tool Room Used Oil Accumulation Area	No	Active
19	Original Container Storage Area	Yes	Underwent RCRA closure in 1982, removed
20	Former Cyanide and Acid Waste Storage Area	Yes	Underwent RCRA closure in 1982, inactive
21	Former Waste Ammonia Etching Solution Tank	No	Inactive, removed
22	Former waste alcohol evaporation pond	No	Inactive

Note:

[a] A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.



SOLID WASTE MANAGEMENT UNITS

SWMU 1 SEE FIGURE 2-B
SWMU 2 SEE FIGURE 2-B
SWMU 3 SEE FIGURE 2-B
SWMU 4 ELECTROPLATING COLLECTION PITS
SWMU 5 CONTAINER STORAGE AREA
SWMU 6 SOLDER DROSS ACCUMULATION AREA I
SWMU 7 SOLDER DROSS ACCUMULATION AREA II
SWMU 8 SOLDER DROSS ACCUMULATION AREA III
SWMU 9 SOLDER PASTE ACCUMULATION AREA
SWMU 10 FLAMMABLE AND NONFLAMMABLE WASTE ACCUMULATION AREA
SWMU 11 1,1,1-TCA VAPOR CLEANER WASTE ACCUMULATION AREA
SWMU 12 FREON VAPOR CLEANER WASTE ACCUMULATION AREA
SWMU 13 1,1,1-TCA PARTS WASHERS WASTE ACCUMULATION AREA
SWMU 14 TCE STILL AND STILL BOTTOMS ACCUMULATION AREA
SWMU 15 PAINT WASTE ACCUMULATION AREA
SWMU 16 MOLDING MACHINES USED OIL ACCUMULATION AREA
SWMU 17 BOILER HOUSE USED OIL ACCUMULATION AREA
SWMU 16 TOOL ROOM USED OIL ACCUMULATION AREA
SWMU 19 ORIGINAL CONTAINER STORAGE AREA
SWMU 20 SEE FIGURE 2-B
SWMU 21 FORMER WASTE AMMONIA ETCHING SOLUTION TANK
SWMU 22 FORMER WASTE ALCOHOL EVAPORATION POND

AREA OF CONCERN

AOC 1 GROUND-WATER CONTAMINATION

⊕ MONITORING WELL LOCATION (MW)
⊕ STANDPIPE LOCATION (SP)

NOTE:
AOC 1 UNDERLIES AREA NEAR BOILER HOUSE.

SOURCE: MODIFIED FROM AN AT&T SKETCH RECEIVED BY PRC ON DECEMBER 16, 1992

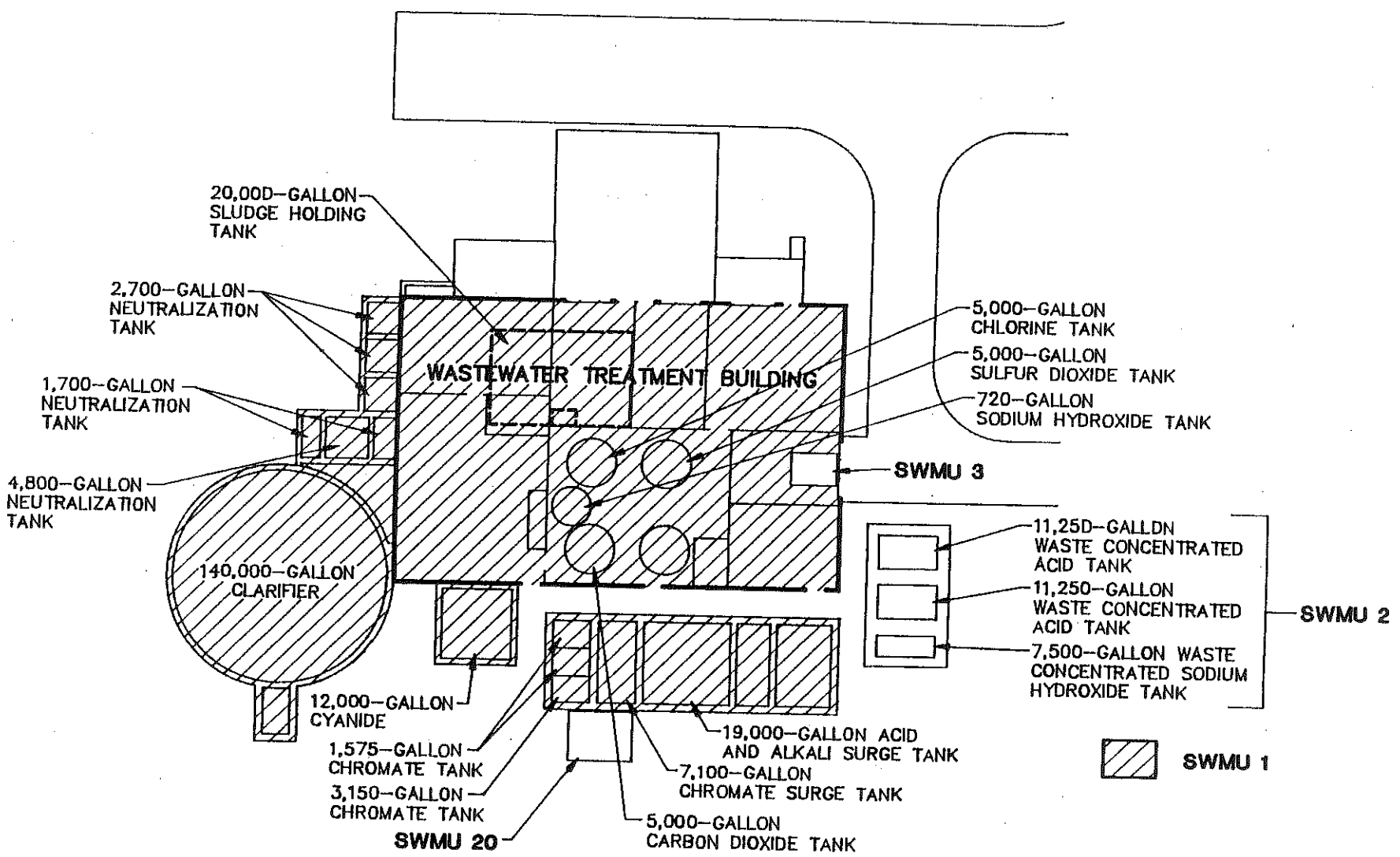
NOT TO SCALE

AT&T
COLUMBUS, OHIO

FIGURE 2-A
FACILITY LAYOUT

PRC ENVIRONMENTAL MANAGEMENT, INC.

AT-ND-T3.DWG - 01/20/93 - MLB 008-C050B70H6Z



SOLID WASTE MANAGEMENT UNITS

SWMU 1 WASTEWATER PRETREATMENT SYSTEM
SWMU 2 CONCENTRATED WASTE TANKS
SWMU 3 WASTEWATER TREATMENT SLUDGE ROLL-OFF BOX
SWMU 20 FORMER CYANIDE AND ACID WASTE STORAGE AREA

SOURCE: MODIFIED FROM AN AT&T SKETCH RECEIVED BY PRC ON DECEMBER 16, 1992

NOT TO SCALE

AT&T
COLUMBUS, OHIO

FIGURE 2-B

FACILITY LAYOUT

PRC ENVIRONMENTAL MANAGEMENT, INC.

TABLE 2

SOLID WASTES

Waste/EPA Waste Code[a]	Source	Solid Waste Management Unit[b, c]
Present Wastes		
Scrap Metal/NA	Fabricating metal parts	5
Spent salt solution/NA	Electrochemical grinding	1
TCE still bottoms/F001	Vapor degreasing of metal parts and TCE recovery	5, 14, and 19
Waste 1,1,1-TCA/F002	Vapor cleaning of circuit boards, stamp cleaning, grinder cleaning, and soldering	5, 8, 10, 11, 13, and 19
Pretreated process wastewater/NA	Electroplating and electrochemical grinding	1
Concentrated waste acid and sodium hydroxide/NA	Electroplating	2
Wastewater treatment sludge/F006	Wastewater treatment	3
Waste chromic acid residue/D001, D002, and D007	Cleaning of Electroplating Collection Pits (SWMU 4) and electroplating tanks	4, 5, and 20
Waste sodium hydroxide residue/D002 and D007	Cleaning of Electroplating Collection Pits (SWMU 4) and electroplating tanks	4, 5, and 19
Waste zinc cyanide residue/F008	Cleaning of Electroplating Collection Pits (SWMU 4) and electroplating tanks	4, 5, and 20

TABLE 2 (Continued)

SOLID WASTES

Waste/EPA Waste Code[a]	Source	Solid Waste Management Unit[b, c]
Zinc and copper plating filters/F008	Maintenance of zinc and copper plating tanks	5
Nickel chloride residue/[c]	Cleaning of Electro-plating Collection Pits (SWMU 4) and electroplating tanks	4 and 5
Waste solder dross/D008	Wave soldering	5, 6, 7, and 8
Waste solder paste/D008	Paste soldering	5 and 9
Waste alcohol/F003 and F005	Soldering, hand cleaning of metal parts, and fuse production	5, 10, 19, and 22
Waste paint/F005	Miscellaneous painting	5, 15, and 19
Waste butyl carbitol/F002	Stamp cleaning	5 and 10
Used oil/NA	Equipment maintenance	5, 16, 17, 18, and 19
Light ballasts containing PCBs/[b]	Removal of light ballasts throughout facility	5

TABLE 2 (Continued)

SOLID WASTES

Waste/EPA Waste Code[a]	Source	Solid Waste Management Unit[b, c]
Past Wastes		
Waste ammonia etching solution/D002	Manufacturing of circuit boards	20
Waste tetrachloroethylene (PCE)/F002	Soldering	5, 8, and 19
Waste freon/F001	Vapor cleaning of circuit boards, stamp cleaning, and hand soldering	5, 8, and 19
Waste MARKEM 320/F005	Stamp cleaning	5 and 10
Waste xylene/F003	Miscellaneous painting	5, 15, and 19

Notes:

[a] Not applicable (NA) designates nonhazardous waste.

[b] This waste is regulated under the Toxic Substance Control Act (TSCA).

[c] EPA has not assigned a hazardous waste code to this waste.

Two additional piping networks are used to transfer highly concentrated wastes into the Wastewater Pretreatment System (SWMU 1). Concentrated wastes are generated when the various electroplating tanks are emptied. The electroplating tanks are randomly emptied about every 3 months. In addition, all the tanks containing concentrated solutions are emptied during the facility's annual tank cleaning and inspection. Concentrated caustic acid wastes are piped into two 11,250-gallon holding tanks near SWMU 1. Concentrated wastes containing sodium hydroxide are piped into a 7,500-gallon holding tank. From these Concentrated Waste Tanks (SWMU 2), the concentrated wastes are slowly fed into SWMU 1. These wastes are fed at a rate of about 0.5 gallon per day. About 39,000 gallons of concentrated acid wastes and 13,000 gallons of concentrated alkali wastes are generated annually (PRC, 1993b).

All the tanks included in the three electroplating systems have pits below them to collect spillage. The Electroplating Collection Pits (SWMU 4) are equipped with automatic pumping systems that pump wastes to the Wastewater Pretreatment System (SWMU 1) via the DAA and the dilute chromate and dilute cyanide piping networks. SWMU 4 is cleaned annually.

About 1,200 pounds of waste chromic acid residue (D001, D002, and D007); 3,500 pounds of waste sodium hydroxide residue (D002 and D007); and 1,500 pounds of nonhazardous waste nickel chloride residue are generated during the annual cleaning of the Electroplating Collection Pits (SWMU 4) and the electroplating tanks. These wastes are drummed, stored in the Container Storage Area (SWMU 5) for less than 90 days, and transported to Heritage Environmental Services in Indianapolis, Indiana, for recycling (AT&T, 1990 and 1992a).

About 2,000 pounds of waste zinc cyanide residue (F008) is generated annually at the AT&T facility. This waste is generated during the annual cleaning of the Electroplating Collection Pits (SWMU 4) and the electroplating tanks, and the maintenance of the zinc and copper plating tanks. Maintenance of these tanks involves the periodic replacement of filters that are used continuously during zinc and copper plating. About three drums of zinc and copper plating filters (F008) are generated annually. These wastes are drummed, stored in the Container Storage Area (SWMU 5) for less than 90 days, and transported to Heritage Environmental Services in Indianapolis, Indiana, for recycling (AT&T, 1990 and 1992a).

Following electroplating operations, resistors and diodes are inserted onto circuit boards. These components are permanently attached to the circuit boards by soldering. Soldering operations are conducted at the facility both by hand and by machine. Hand soldering operations began in 1959. Machine operations include wave soldering and paste soldering. Wave soldering

began in about 1977 and paste soldering began in 1991. Isopropyl alcohol is applied as a flux onto circuit boards prior to soldering operations.

During wave soldering, which involves a spray application of flux, waste solder dross (D008) is skimmed from the top of the solder pots. These pots contain an oxidized tin and lead solder flux. The facility utilizes three wave soldering machines. Two of these machines are used during cellular systems production, and the third is used during network systems production. Waste solder dross is accumulated in containers located adjacent to the wave soldering machines. Wastes managed in Solder Dross Accumulation Area I (SWMU 6) are accumulated in a 1-gallon tin bucket. When filled, the bucket is emptied into a 55-gallon drum that is periodically located adjacent to the bucket. If a 55-gallon drum is not located in SWMU 6, the wastes are transferred to a 55-gallon drum in Solder Dross Accumulation Area II (SWMU 7) or Solder Dross Accumulation Area III (SWMU 8).

Solder Dross Accumulation Area II (SWMU 7) is located adjacent to a wave soldering machine used for cellular systems production. SWMU 7 consists of a 1-gallon tin bucket and a 55-gallon steel drum. Solder Dross Accumulation Area III (SWMU 8) is located adjacent to a wave soldering machine used for network systems production. SWMU 8 consists of two 1-gallon tin buckets and a 55-gallon steel drum. Waste solder dross accumulated in SWMU 6, SWMU 7, and SWMU 8 is transferred to the Container Storage Area (SWMU 5) for less than 90-day storage.

Soldering operations are also conducted using machines that apply solder flux as a paste. The facility uses five solder paste machines that brush solder flux onto the exposed surface of the circuit boards. Waste excess solder paste (D008) that accumulates around the circuit boards is disposed of in a 55-gallon drum adjacent to the solder paste machines. Wastes accumulated in the Solder Paste Accumulation Area (SWMU 9) are also transferred to the Container Storage Area (SWMU 5) for less than 90-day storage.

Currently, solder dross and solder paste are transported off site as D008 hazardous waste. These wastes are transported to the ECS Refining Company in Santa Clara, California. The AT&T facility generated about 6,600 pounds of solder waste in 1991 (AT&T, 1992a). Prior to 1991, solder wastes generated were not regulated as hazardous waste and were transported off site for recycling.

Waste alcohol (F003 and F005) is also generated during soldering operations. After several uses, waste alcohol flux becomes unusable and is disposed of as F003 waste. Waste alcohol is

accumulated in 1-gallon buckets adjacent to the soldering machines and is transferred to a 55-gallon drum used to store miscellaneous flammable wastes located in the Flammable and Nonflammable Waste Accumulation Area (SWMU 10). SWMU 10 is located in an oil storage room and contains one 55-gallon drum used to accumulate flammable wastes and one 55-gallon drum used to accumulate nonflammable wastes. When filled, the drum is moved from SWMU 10 into the Container Storage Area (SWMU 5) for less than 90-day storage. Waste alcohol (F003) was disposed of in the Former Waste Alcohol Evaporation Pond (SWMU 22) until about 1978.

Waste alcohol (F003 and F005) is also generated during hand cleaning of metal relay parts prior to and after hand soldering. Hand cleaning consists of scrubbing metal relay parts in a 1-gallon bucket containing isopropyl alcohol, methanol, or ethanol. Hand cleaning operations are conducted at three locations throughout the AT&T facility (PRC, 1993b). The F003 and F005 wastes are transferred from 1-gallon buckets to a 55-gallon drum in the Flammable and Nonflammable Waste Accumulation Area (SWMU 10). When filled, the drum is transferred from SWMU 10 to the Container Storage Area (SWMU 5) for less than 90-day storage. These wastes are transported off site to the Safety-Kleen Corporation (S-K) recycling center in New Castle, Kentucky. The facility generates 11,100 pounds of F003 and F005 waste annually (AT&T, 1992b).

After various components have been soldered onto the circuit boards, wires are attached. Metal relays are tested using electric currents, and are combined to form switches. Circuit boards and switches are assembled together to form switching systems.

Small plastic and nylon parts are used in the final assembly of circuit boards. These small parts are manufactured at the facility using injection molding machines. Heat is applied to plastic and nylon to make the materials malleable. The materials are injected into molds to form various parts. Nylon wastes generated during this process are taken off site for recycling. Plastic wastes are disposed of in a dumpster along with other nonhazardous wastes, and taken to a municipal landfill.

AT&T also manufactures cabinets to contain switching systems. The cabinets are electrically programmed so AT&T customers can test switching systems purchased from AT&T. These cabinets are painted in a paint booth located in the maintenance building. Toluene is used as a paint thinner. Waste paint containing toluene (F005) is accumulated in a 55-gallon drum near the paint booth. When filled, the drum is moved from the Paint Waste Accumulation Area (SWMU 15) to the Container Storage Area (SWMU 5) for less than 90-day storage. Waste paint

containing toluene is transported as a mixed flammable waste along with waste alcohol to the S-K recycling facility in New Castle, Kentucky. The facility generates about 2,300 pounds of F005 waste paint annually (AT&T, 1992b).

Stamps are used to date items as they are manufactured. These stamps apply ink codes onto finished products and are cleaned in 1-gallon buckets. These buckets are filled with either 1,1,1-TCA or a cleaning compound called butyl carbitol, which consists primarily of ethanol. The facility is currently switching from using 1,1,1-TCA to using butyl carbitol during stamp cleaning operations. Stamp cleaning is conducted at about 15 locations throughout the AT&T facility.

Waste butyl carbitol (F002) is transferred from 1-gallon buckets to a 55-gallon drum in the Flammable and Nonflammable Waste Accumulation Area (SWMU 10). When filled, the drum is transferred from SWMU 10 to the Container Storage Area (SWMU 5) for less than 90-day storage. These wastes are transported off site to the S-K recycling center in New Castle, Kentucky. The facility generates about 550 pounds of F002 waste annually (AT&T, 1992b).

The facility uses two parts washers that contain 1,1,1-TCA. These washers are used to clean metal grinders that are used in milling machines. The washers each contain about 12 gallons of 1,1,1-TCA. Waste 1,1,1-TCA (F002) is pumped into an adjacent 55-gallon drum. When filled, the drum is taken from the 1,1,1-TCA Parts Washers Waste Accumulation Area (SWMU 13) to the Container Storage Area (SWMU 5) for less than 90-day storage. The waste is then taken to the S-K recycling facility in Hebron, Ohio. AT&T generates 5,800 pounds of waste 1,1,1-TCA annually (AT&T, 1992b).

Used oil is generated during equipment maintenance. Used oil is accumulated in one of three areas before it is moved to the Container Storage Area (SWMU 5) for storage. The Molding Machines Used Oil Accumulation Area (SWMU 16) is used to accumulate used oil generated during the maintenance of injection molding machines. The Boiler House Used Oil Accumulation Area (SWMU 17), which is located in the boiler house, is used to accumulate used oil generated during the maintenance of air compressors. The Tool Room Used Oil Accumulation Area (SWMU 18), which is located in the tool room, is used to accumulate used oil generated during the maintenance of drilling machines. Used oil is moved from SWMUs 16, 17, and 18 to SWMU 5 for storage. Used oil is ultimately taken off site to the S-K recycling facility in New Castle, Kentucky, for fuel blending. The AT&T facility generates about 29,000 pounds of used oil annually (AT&T, 1992b).

The AT&T facility is currently removing light ballasts from overhead lights at the facility. These ballasts contain PCBs. The ballasts are placed in 55-gallon drums and is stored in the Container Storage Area (SWMU 5) for less than 90 days. The PCB material is transported off site to Salesco Systems in Phoenix, Arizona. The AT&T facility generates 10,800 pounds of waste PCB light ballasts annually (AT&T, 1992b).

The facility has used two areas for the container storage of hazardous waste. The Original Container Storage Area (SWMU 19) was used to store hazardous waste and nonhazardous used oil in 55-gallon drums. SWMU 19 was used to store these wastes from 1959 until 1982. The Former Cyanide and Acid Waste Storage Area (SWMU 20) was used to store cyanide and acid waste in 55-gallon drums from 1959 until about 1985. Both of these units were used to store wastes for greater than 90 days. Both units underwent RCRA closure in 1982 (EPA, 1982). After these units were closed, SWMU 19 became inactive and SWMU 20 was used until 1985 to store wastes for less than 90 days. SWMU 20 has been inactive since 1985.

Past wastes generated at the AT&T facility include waste ammonia etching solution (D002), waste tetrachloroethylene (PCE) (F002), waste freon (F001), waste MARKEM 320 (F005), and waste xylene (F003). As discussed earlier, past facility operations included copper and aluminum etching, and gold plating associated with manufacturing of circuit boards. An ammonia etching solution was used in these operations. The facility formerly had one 8,000-gallon fiberglass tank that contained virgin solution and one 8,000-gallon fiberglass tank that contained waste ammonia etching solution. These tanks were located in the northeast section of the manufacturing building. The Former Waste Ammonia Etching Solution Tank (SWMU 21) was used to store waste ammonia etching solution (D002) for less than 90 days before the waste was transported off site for disposal.

Fuses were manufactured at the facility from 1959 until June 1992. A 250-gallon steel tank containing alcohol was used during fuse manufacturing. According to Mr. Howell, when the alcohol became unusable, the tank contents were disposed of in the Former Waste Alcohol Evaporation Pond (SWMU 22). The tank was emptied into SWMU 22 about twice a year. According to Mr. Howell, SWMU 22 was used until about 1978 and only managed waste alcohol (F003) from fuse manufacturing. The facility discharged waste alcohol (F003) directly to the city of Columbus sanitary sewer from 1978 until about 1982. The facility has stored all waste alcohol in 55-gallon drums since 1982 (PRC, 1993b).

The facility formerly used rosin in soldering operations. Rosin was applied to circuit boards prior to soldering operations. After soldering, excess rosin was removed from the circuit boards using cleaning solvents. PCE and 1,1,1-TCA were used to remove excess rosin after machine soldering, and freon was used to clean circuit boards after hand soldering. Freon and PCE were used in soldering operations until about 1990, and 1,1,1-TCA was used until 1992. Seven soldering machines were located in the network systems production area. Waste solvents generated by the soldering operations in this area were accumulated in 55-gallon drums located in Solder Dross Accumulation Area III (SWMU 8) (AT&T, 1993). When filled, drums containing waste PCE (F002) or waste 1,1,1-TCA were taken to the Container Storage Area (SWMU 5) for less than 90-day storage and ultimately transported off site to the S-K recycling facility in Hebron, Ohio.

Freon and a cleaning compound called MARKEM 320, which consists of isopropyl alcohol and ethyl acetate, were used during stamp cleaning. Nonflammable waste freon (F002) and flammable waste MARKEM 320 (F005) were accumulated in the Flammable and Nonflammable Waste Accumulation Area (SWMU 10) and transferred to the Container Storage Area (SWMU 5) for less than 90-day storage. These wastes were ultimately transported off site to the S-K recycling facility in New Castle, Kentucky.

The AT&T facility used freon in vapor cleaners. According to Mr. Howell, seven such cleaners were used to clean surface dirt and flux from circuit boards after soldering. Two of these cleaners are still present at the facility. One of these vapor cleaners was installed in May 1980 and removed from service on December 18, 1992 (AT&T, 1992b). Waste freon generated during vapor cleaning was accumulated in 55-gallon drums adjacent to the vapor cleaners and transferred to the Container Storage Area (SWMU 5) for less than 90-day storage. Prior to 1982, waste freon was stored in the Original Container Storage Area (SWMU 19). As discussed earlier, the other active vapor cleaner was converted from freon to 1,1,1-TCA in July 1992.

Waste freon (F001) generated by the vapor cleaner that became inactive on December 18, 1992, was accumulated in an adjacent 55-gallon drum. When filled, the drum was moved from the Freon Vapor Cleaner Waste Accumulation Area (SWMU 12) to the Container Storage Area (SWMU 5) for less than 90-day storage. Waste freon was transported off site along with waste 1,1,1-TCA to the S-K recycling center in Hebron, Ohio. The facility generated 8,500 pounds of waste freon in 1991 (AT&T, 1992a).

Waste xylene (F003) was generated at the facility during miscellaneous painting operations conducted in the paint booth. Xylene was used as a paint thinner and to clean paint guns used in the paint booth located in the maintenance building. Waste xylene was accumulated in a 55-gallon drum in the Paint Waste Accumulation Area (SWMU 15). When filled, the drum was moved to the Container Storage Area (SWMU 5) for less than 90-day storage. Prior to 1982, the waste was stored in the Original Container Storage Area (SWMU 19).

2.4 HISTORY OF DOCUMENTED RELEASES

This section discusses the history of documented releases to ground water, surface water, air, and on-site soils at the AT&T facility.

In 1983, a Phase I hydrogeologic investigation was conducted by Burgess and Niple, Ltd. (B&N) in response to a release of 1,1,1-TCA; TCE; and PCE. In April 1986, OEPA inspected the AT&T facility as a follow-up visit to a spill incident report (OEPA, 1986). Reportedly, the release occurred in an underground trench that contained metal pipes used to carry the solvents. This trench also contained polyvinyl chloride (PVC) pipes used to carry acid, and steam lines. The report did not state what the steam pipes were constructed of. Steam caused the PVC pipes to warp and break, allowing acid to erode the metal pipes carrying the solvents (OEPA, 1986). The report did not state when the release took place, the location of the trench, the amount of solvents released, or the amount and type of acid that was released.

The Phase I hydrogeologic investigation report stated that 1,1,1-TCA; TCE; and PCE were detected in ground-water samples collected from a collection drain in late 1982. This drain extends around the foundation of the boiler house. TCE and 1,1,1-TCA were also detected in ground-water samples collected from a standpipe that was used as an on-site monitoring well (B&N, 1983).

B&N's report concluded that the ground-water contamination beneath the AT&T facility was caused by on-site sources. The report also noted that the vinyl chloride and toluene identified in ground-water samples collected from the boiler house collection drain were not associated with chlorinated solvents used at the AT&T facility. The report cited the facility's USTs, underground pipelines, aboveground solvent pump, and the Former Waste Alcohol Evaporation Pond (SWMU 22) as potential sources of contamination. The report states that the AT&T facility stored chemicals and oil in USTs. The report does not state the number of USTs at the facility, the size of the USTs, or the type of chemicals stored in the USTs (B&N, 1983).

According to Mr. Howell, the trench in which this release occurred was located along the driveway between the boiler house and the wastewater treatment facility. He stated that underground piping was formerly used to transfer 1,1,1-TCA; TCE; and PCE from aboveground tanks into the manufacturing building. According to Mr. Howell, No. 2 fuel oil was the only material stored in USTs, and 1,1,1-TCA; TCE; and PCE were stored in aboveground tanks (PRC, 1993b). He also stated that all underground piping used to transfer these chemicals were removed and replaced with aboveground piping in about 1960 (PRC, 1993b).

As a result of the Phase I hydrogeologic investigation, six monitoring wells and two stand pipes were installed to characterize the extent of contamination. Ground-water sampling confirmed the presence of 1,1,1-TCA; TCE; and PCE in ground water collected from the boiler house collection drain and in a monitoring well located near the solvent storage tanks. The Phase II hydrogeologic investigation report concluded that ground water in the bedrock aquifer beneath the facility was contaminated by solvents released from the solvent storage tanks and unloading areas (B&N, 1986). The ground-water sampling results are shown in Attachment D. No available information indicates that AT&T proposed a plan to remediate the contamination, or that OEPA required AT&T to do so.

The boiler house collection drain mentioned in B&N's reports is a pit that is about 12 feet below the building's basement floor (PRC, 1993b). The drain is used to collect ground water that is then drained into a sump. A pump then discharges the water directly into the city of Columbus sanitary sewer system, thereby lowering the ground-water table around the building's foundation. According to Mr. Howell, AT&T collects ground-water samples from the drain biannually and analyzes them for TCE; PCE; and 1,1,1-TCA. AT&T is not required to and does not report the analytical results to OEPA (PRC, 1993b).

A 12,000-gallon and a 3,000-gallon UST were removed from the facility in 1988. These tanks were constructed of steel and contained No. 2 fuel oil. According to Mr. Howell, a fuel oil release was detected when the tanks were removed. Because of this release, OEPA required that AT&T remove approximately 40 cubic yards of oil-contaminated soil from around the tanks. No available information documents whether confirmatory soil samples were collected, or whether all contaminated soil was removed.

During an OEPA inspection in February 1991, the facility was cited for storing F006 wastewater treatment sludge in two outdoor roll-off boxes that were not well contained (OEPA, 1991c). Soil sampling conducted near the two roll-off boxes identified the presence of nickel and

chromium in concentrations above background levels, thus indicating a release of F006 wastewater treatment sludge to the underlying soils (OEPA, 1992a). AT&T removed contaminated soil from the eastern edge of the wastewater treatment building and along a driveway that runs past the maintenance building located east of the wastewater treatment building. Available information does not indicate how much contaminated sold was removed. In July 1992, OEPA determined that the soil removal adequately remediated the soil contamination associated with the F006 wastewater treatment sludge release (OEPA, 1992b).

It should be noted that Columbus Steel Drums, located northeast of the AT&T facility, is currently involved in corrective action procedures with OEPA in response to ground-water contamination at its facility. The ground-water contamination was due to a release of paint containing toluene and possibly xylene (PRC, 1993e). However, B&N's 1983 hydrogeologic investigation report states that because of the isolated nature of the land surface at the AT&T facility, and the presence of impervious shale in the area, the potential for ground-water contamination migrating from Columbus Steel Drums to the AT&T facility is low. B&N determined the direction of regional ground-water flow to be to the east (B&N, 1983).

In addition, eight releases at the AT&T facility were reported to the OEPA Emergency Response Division between January 1978 and July 1986. These releases, which include releases of HCL, sodium hydroxide solution, PCE, oil, and hexachrome, are summarized in an OEPA Emergency Response Pollution Incidents database. Limited information regarding these releases is provided in a computer print out of OEPA's database. Exact locations of these releases are not known; however, four of these releases affected Big Walnut Creek, two affected ground water, and one affected soils (OEPA, 1993).

2.5 REGULATORY HISTORY

Western Electric submitted a Notification of Hazardous Waste Activity to EPA on August 18, 1980 (Western Electric, 1980a). The facility submitted a RCRA Part A permit application on November 14, 1980. This application listed the following process codes and capacities: 41,250 gallons of container storage (S01); 16,000 gallons of tank storage (S02); 79,000 cubic yards of waste pile storage (S03); and 748,000 gallons per day of tank treatment (T01). The application listed the following waste codes: D002, F001, F002, F003, F005, F006, F007, F008, F009, and F010 (Western Electric, 1980b).

In October 1982, Western Electric petitioned EPA to remove process codes S02, S03, and T01 from the facility's Part A permit application. The facility claimed that it was exempt from permitting two (S02) 8,000-gallon storage tanks because one contained product ammonia etching solution and the other contained waste ammonia etching solution that was recycled. The facility also claimed that it had incorrectly filed the S03 process code as a protective measure. Finally, the facility claimed it was exempt from permitting the (T01) wastewater pretreatment system because the system discharged to a publicly owned wastewater treatment facility. The facility also informed EPA that the Original Container Storage Area (SWMU 19) and the Former Cyanide and Acid Waste Storage Area (SWMU 20) were closed in accordance with the facility's closure plan (Western Electric, 1982a).

In November 1982, EPA acknowledged receipt of the facility's revised Part A permit application and approved closure of the facility's Original Container Storage Area (SWMU 19) and the Former Cyanide and Acid Waste Storage Area (SWMU 20). During closure activities, both units were decontaminated, 125 drums of used oils and waste solvents were removed from SWMU 19, and 150 drums of corrosive waste were removed from SWMU 20. The oils and solvents were taken to a recycling facility, and the corrosive wastes were taken to a hazardous waste landfill. Closure of these units changed the facility's regulatory status to a generator of hazardous waste only (Western Electric, 1982a and EPA, 1982).

In June 1986, AT&T submitted an updated Notification of Hazardous Waste Activity for the facility. This notification did not include EPA hazardous waste code F010. AT&T stated that the process that generated this waste had been eliminated. AT&T did not specify what type of process was eliminated (AT&T, 1986). The facility is currently regulated as a large-quantity generator storing hazardous wastes for less than 90 days.

In the past, the facility has had RCRA compliance problems. An inspection conducted by OEPA in June 1982 cited Western Electric for disposing of waste ethanol on the ground behind the facility (OEPA, 1982). The area referred to in OEPA's inspection report may have been the Former Waste Alcohol Evaporation Pond (SWMU 22). Western Electric was also cited for various paperwork deficiencies, including the lack of a waste analysis plan, contingency plan, closure plan, and operating record (OEPA, 1982). Western Electric responded to the violations (Western Electric, 1982b), and the facility was again inspected by OEPA in January 1983. During this inspection, Western Electric was found to be in compliance with RCRA regulations, except for one paperwork violation and one drum labeling violation (OEPA, 1983).

In April 1986, OEPA inspected the facility after 1,1,1-TCA; TCE; and PCE were released to the ground water. (See Section 2.4 for a discussion of the Hydrogeologic Investigation conducted in response to the release.)

In February 1991, OEPA inspected the facility and cited AT&T for storing F006 wastewater treatment sludge in two roll-off boxes that were not well contained (OEPA, 1991a and 1991c). Soil sampling confirmed that F006 sludge, which contained nickel and chromium, had been released to the underlying soils. (See Section 2.4 for a discussion of the remedial actions taken in response to the release.)

The OEPA Air Pollution Control Division has issued AT&T 25 operating air permits for machines used throughout the facility, including soldering machines, the TCE vapor degreaser and the automatic zinc, cyanide, and nickel plating machine. OEPA has issued 28 permits to install machines, including various grinding machines. An additional 45 machines have been registered with the OEPA Air Pollution Control Division (AT&T, 1992c).

Five incidences of air permit exceedence were reported by AT&T to the Ohio Environmental Protection Agency (OEPA). These incidences occurred between December 1987 and October 1988. These five reported incidences resulted from the release of PCE in exceedence of the facility's permitted allowable limits (OEPA, 1993). Available information does not state the machines from which PCE was released.

The facility has two National Pollutant Discharge Elimination System (NPDES) permits. The permits allow the facility to discharge water into an unnamed tributary to Big Walnut Creek. The permitted discharges include water from the facility's drinking fountains, noncontact cooling water from two cooling towers used to cool the refrigerant units of two air conditioning systems, and storm water runoff. The permits require AT&T to monitor the discharge flow monthly and report the water's pH to OEPA (OEPA, 1991b).

Permitted discharges from the facility flow south into two storm sewers along Broad Street and into a pond on the south side of Broad Street. The pond empties into a stream that drains west into Big Walnut Creek, which is about 1 mile south of the facility.

The facility is also permitted by the city of Columbus to discharge pretreated process wastewater into the city of Columbus sanitary sewer system. According to Mr. Howell, AT&T samples the discharged wastewater quarterly and analyzes the water samples for all metals and

cyanide. AT&T reports the analytical results and the water's pH to the city of Columbus (PRC, 1993b).

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the AT&T facility.

2.6.1 Climate

The climate in Franklin County is characterized by warm, humid summers and cold, cloudy winters. The yearly average temperature is 52 °F. The lowest monthly average temperature is 30 °F in January, and the highest monthly average temperature is 75 °F in July. Precipitation in central Ohio is fairly well distributed throughout the year. The yearly average rainfall in Franklin County is 36.71 inches. Rainfall peaks in March at 4.17 inches; the lowest monthly rainfall is 2.23 inches in October. The prevailing wind is to the northeast and averages 9 miles per hour throughout the year. The 1-year, 24-hour rainfall average is 2.3 inches, and annual yearly net precipitation is 3.71 inches (USDC, 1968).

2.6.2 Flood Plain and Surface Water

The AT&T facility is located in an area of minimal flooding (FEMA, 1987). The nearest surface water body, Blacklick Creek, is located 0.5 mile east of the facility and is used for recreational purposes. Big Walnut Creek is a larger surface water body also used for recreational purposes. This creek is located about 1 mile west of the facility. These two creeks flow southwest and discharge to the Scioto River. The city of Columbus obtains its municipal water supply from three reservoirs, the closest of which is Hoover Reservoir located along Big Walnut Creek about 7 miles upstream of the AT&T facility (PRC, 1993a).

The AT&T facility is located within the Big Walnut Creek drainage basin. Surface water drainage at the facility is to the south toward a pond on the south side of Broad Street. The pond empties into a stream that drains west into Big Walnut Creek.

2.6.3 Geology and Soils

The AT&T facility is located in a glaciated transition region between two physiographic provinces defined as the Central Lowlands and the Appalachian Plateau. This region was dissected during preglacial times by ancestral streams. Subsequent glaciation filled the stream valleys and covered the adjacent highlands with a heterogeneous mixture of sands, silts, gravels and clays. The thickness of these deposits varies substantially in this region from a few feet on top of the bedrock highs to over 200 feet in the center of deeply eroded valleys. The Blacklick stream valley is to the east and the Big Walnut stream valley is to the west of the AT&T facility. The facility is located along the crest of a bedrock ridge that is in between these two ancestral stream valleys (B&N, 1983).

Surface soils at the facility consist of two main soil types. The first type, Cardington silt loam occurs mainly in the northern half of the facility. This soil is typically a deep, moderately well drained soil with moderately low permeability. A subtype of the Cardington silt loam is the Cardington-Urban land complex that occurs mainly in the southern portion of the facility. This soil has been altered by construction at the facility so that exact identification of its characteristics is impossible. The second type of soil is Bennington silt loam that occurs along the extreme northwestern portion and extreme eastern side of the facility. The Bennington series is typically a moderately poor drained soil with low permeability (B&N, 1983).

Soil boring logs for water wells located near the facility state that unconsolidated glacial deposits near the facility consist of clay, sand, and gravel. Glacial deposits west of the plant are generally less than 30 feet thick and consist primarily of clay. Unconsolidated deposits east of the facility consist of clay or sand and gravel and are up to 180 feet thick (B&N, 1983).

The bedrock underlying the AT&T facility is of Mississippian and Devonian Ages. The rock formations as they occur in descending order from the bedrock surface are the Berea Sandstone, 5 to 55 feet thick; the Bedford Shale, 50 to 90 feet thick; and the Ohio Shale, 400 to 500 feet thick. The Berea Sandstone of Mississippian Age is a relatively pure, fine grained material that can be thin to massively bedded and may contain some layers of sandy shale. The Bedford shale, which is the basal formation of the Mississippian system, is generally a soft reddish-brown or bluish-gray material containing appreciable amounts of clay. The Ohio shale is a dark and somewhat sandy material that grades from massive to thinly laminated shale. All three of these rock formations are encountered at the bedrock surface in the vicinity of the AT&T facility (B&N, 1983).

2.6.4 Ground Water

Ground water is not a primary source of drinking water in the vicinity of the AT&T facility. The city of Columbus supplies water to the AT&T facility and nearby residences. The municipal water supply is obtained from three reservoirs. The closest of these is Hoover Reservoir located along Big Walnut Creek, about 7 miles upstream of the AT&T facility (PRC, 1993a).

Ground-water recharge near the facility is primarily attributable to precipitation. Based on surficial topography at the facility, the direction of regional ground-water flow is believed to be to the east (B&N, 1983). Ground water in the vicinity of the AT&T facility can be obtained from wells screened in both glacial deposits and bedrock. Ground-water yields of up to 500 gallons per minute have been reported for wells screened in sand and gravel deposits in the Blacklick stream valley located east of the facility. Bedrock ground-water yields are highly variable depending on the formations encountered. Private water wells screened in glacial deposits and formerly used within 3,000 feet of the AT&T facility yielded an average of 15 gallons per minute. Wells within 3,000 feet of the facility and screened in bedrock yielded up to 10 gallons per minute.

2.7 RECEPTORS

The AT&T facility occupies 253 acres in a mixed-use area in Columbus, Ohio. Columbus has a population of about 633,000. About 67,000 residences live within 2 miles of the facility (PRC, 1993c). The nearest receptors of a release from the AT&T facility include AT&T's 6,200 employees. The nearest residences are located about 0.25 mile south of the facility.

The AT&T facility is bordered on the north by the Bedford I Landfill, located about 0.5 mile northwest of the facility, and the Bedford II Landfill, located about 1 mile northwest of the facility; on the northeast by Columbus Steel Drums, a drum recycling facility; on the west by the Forest Lawn Cemetery; on the south by a commercial plaza and the Mount Carmel Medical Complex; and on the east by an industrial complex consisting of various warehouses and an aluminum can manufacturing company. Facility access is controlled by 24-hour security. A 6-foot chainlink fence completely encloses the facility.

The nearest surface water body, Blacklick Creek, is located about 0.5 mile east of the facility and is used for recreational purposes. A larger surface water body, also used for

recreational purposes, is Big Walnut Creek, located about 1 mile west of the facility. The city of Columbus obtains its municipal water supply from three reservoirs, the closest of which is Hoover Reservoir located about 7 miles upstream from the AT&T facility.

Sensitive environments are not located on-site. Gahana Woods is a wet meadow wetland consisting of shallow wet marshes and low trees. This area is located about 2 miles northeast of the facility. Gahana Woods is about 7 acres in size. Several smaller wetlands, between 1 and 2 acres in size, are located within 2 miles of the AT&T facility (PRC, 1993d).

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the 22 SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations. Figures 2-A and 2-B show the SWMU locations.

SWMU 1 **Wastewater Pretreatment System**

Unit Description: This unit consists of the following outdoor tanks: a 19,000-gallon acid and alkali surge tank; a 7,100-gallon chromate surge tank; a 6,300-gallon chromate tank; a 12,000-gallon cyanide tank; three 2,700-gallon neutralization tanks; two 1,700-gallon neutralization tanks; a 4,800-gallon neutralization tank; a 140,000-gallon clarifier; and a 20,000-gallon sludge holding tank.

These tanks are located below grade and are open to the atmosphere on top. All of these tanks, except for the chromate tanks, are constructed of concrete and are lined with PVC. The chromate tanks are constructed of concrete and lined with acid brick. All of these tanks, except for the clarifier, are covered with metal grating.

This unit also consists of an indoor filter press with a capacity of 2.1 cubic yards. This unit also consists of the following indoor tanks: a 5,000-gallon chlorine tank; a 5,000-gallon sulfur dioxide tank; a 5,000-gallon carbon dioxide tank; a 720-gallon sodium hydroxide tank; and a 20,000-gallon sludge holding tank. These tanks are constructed of steel and are located in the wastewater treatment building.

Date of Startup: This unit began operation in 1959.

Date of Closure: This unit is active.

Wastes Managed: This unit pretreats process wastewater generated by electroplating operations and electrochemical grinding. Average flow through the system is about 75,000 gallons per day. The Wastewater Treatment Sludge Roll-off Box (SWMU 3) is below the filter press and collects F006 wastewater sludge.

Release Controls: According to Mr. Howell, all the tanks in this unit are emptied and inspected annually. A control room located in the wastewater treatment building constantly monitors the flow of wastewater into and out of all tanks in this unit.

The wastewater treatment building provides containment for the indoor tanks of this unit. Also, a trench located around the room that contains the 20,000-gallon sludge holding tank collects any liquid spills in the room and pumps the liquid into the neutralization tanks.

History of Documented Releases: No releases from this unit have been documented.

Observations: PRC observed waste chromate, waste cyanide, and mixed acid and alkali wastes in the various outdoor tanks of this unit. PRC observed no cracks in the visible concrete. The indoor steel tanks appeared to be in sound condition. PRC observed no evidence of release (see Photographs No. 1, 2, and 3).

SWMU 2 **Concentrated Waste Tanks**

Unit Description: This in-ground unit is located adjacent to the Wastewater Pretreatment System (SWMU 1). This unit consists of three rectangular concrete tanks that are open to the atmosphere on top. Two of the tanks have a capacity of 11,250 gallons and are used to store concentrated acid waste. The third tank has a capacity of 7,500 gallons and is used to store concentrated waste sodium hydroxide.

Date of Startup:	This unit began operation in 1959.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages concentrated acid and concentrated sodium hydroxide wastes generated by the facility's electroplating operations. The wastes contained in this unit are gradually fed into the facility's Wastewater Pretreatment System (SWMU 1) for treatment and ultimately discharged into the city of Columbus sanitary sewer system.
Release Controls:	This unit is equipped with pumps and high-level alarms to prevent overfilling. A control room located in the wastewater treatment building is used to constantly monitor the flow of waste into and out of this unit. The tanks are lined with PVC. One of the acid tanks is also lined with rubber.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	During the VSI, the tanks storing waste acid each contained about 3,750 gallons of waste and the third tank contained about 500 gallons of waste sodium hydroxide. The concrete walls of this unit appeared intact. PRC noted no evidence of release (see Photograph No. 4).
SWMU 3	**Wastewater Treatment Sludge Roll-Off Box**
Unit Description:	This unit is located indoors in the wastewater treatment building. This unit consists of a 25-cubic-yard steel roll-off box located below a filter press.
Date of Startup:	This unit began operation in 1959.
Date of Closure:	This unit is active.

Wastes Managed:	This unit manages F006 wastewater treatment sludge generated by the facility's wastewater treatment process. The wastes managed in this unit are ultimately disposed of at the Adams Center Landfill in Fort Wayne, Indiana.
Release Controls:	This steel unit is located indoors on a concrete surface and is lined with plastic.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The unit contained approximately 6 cubic yards of F006 wastewater treatment sludge. This steel unit appeared in sound condition. PRC observed no floor drains near this unit. PRC noted no evidence of release (see Photographs No. 5 and 6).
SWMU 4	**Electroplating Collection Pits**
Unit Description:	This unit consists of indoor concrete pits that underlie all the tanks used in the three electroplating areas. The total capacity of this unit is unknown. The pits are equipped with automatic pumping systems that pump wastes to the Wastewater Pretreatment System (SWMU 1) via the DAA and the dilute chromate and dilute cyanide piping networks. According to Mr. Howell, the pits are separated according to the types of wastes managed. Similar wastes will be collected in connecting pits and pumped collectively to SWMU 1.
Date of Startup:	This unit began operation in 1959.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages waste acid and alkali solutions, waste chromate, and waste cyanide solutions that spill during electroplating operations. The wastes managed in this unit are pumped through the DAA, chromate, or cyanide piping networks into the Wastewater Pretreatment System (SWMU 1) for treatment.

Release Controls:	This unit is equipped with automatic pumps. The pumps activate when liquid wastes have accumulated in the unit, pumping the wastes into the Wastewater Pretreatment System (SWMU 1.)
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The portion of this unit located below the programmable hoist plater and automatic nickel and chrome plater is covered by metal grating and was not visible. The portion of this unit below the acid-tin barrel plating tanks was partially visible during the VSI and contained metal pipes. However, the concrete surface of this unit could not be observed. PRC did hear one of the unit's pumps activate during the VSI (see Photographs No. 7, 8, and 9).
SWMU 5	**Container Storage Area**
Unit Description:	This unit is located outdoors at the north end of the manufacturing building. This area is divided into two sections, one roofed, the other open. The roofed section has a concrete base, measures 44 feet by 74 feet, and is roofed. This unit is enclosed by 6-inch concrete curbing and has a center collection trench. Drums containing like wastes are stored together in this unit. The open area measures 80 feet by 80 feet and manages scrap metal in 25 cubic yard roll-off boxes.
Date of Startup:	This unit began operation in approximately 1982.
Date of Closure:	This unit is active.
Wastes Managed:	The roofed section manages manages all the hazardous waste and nonhazardous used oil generated at the AT&T facility. Hazardous wastes are stored in this unit for less than 90 days and are picked up for off-site disposal or recycling. Nonhazardous used oil is picked up for off-site fuel blending. The open section manages scrap metal.

Release Controls:	This unit is surrounded by 6-inch concrete curbing and has a center collection trench. The trench is covered with metal grating, measures approximately 20 feet by 10 inches, and is approximately 8 inches deep. This unit is also equipped with a sprinkler system and enclosed by a 6-foot chain link fence. Drums containing like wastes are stored together in this unit.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The roofed section contained 23 55-gallon drums of used oil; five drums of waste TCE; one drum of waste 1,1,1-TCA; five drums of F002 waste; one drum of F005 waste; one drum of F003 and F005 waste; six drums of solder dross; one drum of waste solder paste; and one drum of PCB waste. The drums were stored on wooden pallets. PRC observed staining of the concrete base of this unit. No cracks in the base were observed (see Photographs No. 10 and 11). The open section contained one partially filled roll-off box containing scrap metal.
SWMU 6	**Solder Dross Accumulation Area I**
Unit Description:	This indoor unit consists of a total area of about 10 square feet. A 2-foot by 2-foot area is designated for the storage of a 55-gallon drum, and a table with a surface area of about 2-feet by 3-feet is designated for the storage of a 1-gallon tin bucket. The unit is located adjacent to a wave soldering machine used for cellular systems production in the manufacturing building. The base of this unit is a tile floor. PRC observed no nearby floor drains.
Date of Startup:	This unit began operation in about 1977.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages waste solder dross (D008) generated during wave soldering. Wastes from this unit are transferred to the Container

	Storage Area (SWMU 5) for less than 90-day storage and ultimately picked up for off-site recycling.
Release Controls:	This unit is located indoors in a completely enclosed building that is equipped with a sprinkler system. PRC observed no nearby floor drains.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The unit contained a partially filled 1-gallon bucket of waste solder dross (D008). At the time of the VSI, the 55-gallon drum was not at the unit. PRC noted no evidence of release (see Photograph No. 12).
SWMU 7	**Solder Dross Accumulation Area II**
Unit Description:	This indoor unit consists of a total area of about 15 square feet. An area measuring 3-feet by 3-feet is designated for the storage of a 55-gallon drum, and a table with a surface area of about 2-feet by 3-feet is designated for the storage of a 1-gallon tin bucket. The unit is located adjacent to a wave soldering machine used for cellular systems production in the manufacturing building. The drum is located on a wooden pallet and the base of this unit is a tile floor. PRC observed no nearby floor drains.
Date of Startup:	This unit began operation in about 1977.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages waste solder dross (D008) generated during wave soldering. The wastes in this unit are transferred to the Container Storage Area (SWMU 5) for less than 90-day storage and are ultimately picked up for off-site recycling.

Release Controls:	This unit is located indoors in a completely enclosed building. The building is equipped with a sprinkler system. PRC observed no nearby floor drains.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	During the VSI, the unit contained a partially filled 1-gallon bucket and a partially filled 55-gallon drum of waste solder dross. PRC noted no evidence of release (see Photographs No. 13 and 14).
SWMU 8	**Solder Dross Accumulation Area III**
Unit Description:	This indoor unit consists of a total area of about 15 square feet. An area measuring 3-feet by 3-feet is designated for the storage of a 55-gallon drum, and a table with a surface area of about 2-feet by 3-feet is designated for the storage of two 1-gallon tin buckets. The unit is located adjacent to a wave soldering machine used during network systems production in the manufacturing building. The drum is located on a wooden pallet and the base of this unit is a tile floor. PRC observed no nearby floor drains.
Date of Startup:	This unit began operation in about 1977.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages waste solder dross (D008) generated during wave soldering. The wastes in this unit are transferred to the Container Storage Area (SWMU 5) for less than 90-day storage and are ultimately picked up for off-site recycling.
Release Controls:	This unit is located indoors in a completely enclosed building. The building is equipped with a sprinkler system.
History of Documented Releases:	No releases from this unit have been documented.

Observations:	During the VSI, the unit contained two partially filled buckets and one partially filled 55-gallon drum of waste solder dross. PRC noted no evidence of release (see Photographs No. 15 and 16).
SWMU 9	**Solder Paste Accumulation Area**
Unit Description:	This indoor unit consists of an area measuring about 4-feet by 4-feet. This unit contains a 55-gallon steel drum located on a wooden pallet. The unit is located near the solder paste machines used for cellular systems production.
Date of Startup:	This unit began operation in about 1977.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages waste solder paste (D008) generated during paste soldering. The wastes in this unit are transferred to the Container Storage Area (SWMU 5) for less than 90-day storage and are ultimately picked up for off-site recycling.
Release Controls:	This unit is located indoors in a completely enclosed building. The building is equipped with a sprinkler system. PRC observed no nearby floor drains.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The unit contained one partially filled 55-gallon drum of waste solder paste. PRC noted no evidence of release (see Photograph No. 17).
SWMU 10	**Flammable and Nonflammable Waste Accumulation Area**
Unit Description:	This indoor unit is located in a product oil storage room in the northeast section of the manufacturing building. The unit consists of an area measuring about 12-feet by 5-feet. The unit contains

	two 55-gallon drums located on a concrete floor. PRC observed no nearby floor drains.
Date of Startup:	This unit began operation in 1959.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages hazardous flammable and nonflammable wastes. Flammable wastes include waste alcohol (F003 and F005) and nonflammable wastes include waste 1,1,1-TCA and waste butyl carbitol (both are F002 wastes). Wastes managed in this unit are transferred to the Container Storage Area (SWMU 5) for less than 90-day storage and ultimately picked up for off-site recycling.
Release Controls:	This unit is located in a completely enclosed room equipped with a sprinkler system. PRC observed no nearby floor drains.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The unit contained one partially filled 55-gallon drum of F003 and F005 wastes, and one partially filled 55-gallon drum of F002 nonflammable wastes. An empty 30-gallon drum was located adjacent to the 55-gallon drums. PRC observed staining on the concrete base of this unit. No cracks in the concrete were observed (see Photograph No. 18).
SWMU 11	**1,1,1-TCA Vapor Cleaner Waste Accumulation Area**
Unit Description:	This unit consists of an indoor area measuring about 4-feet by 4-feet. This unit contains a 55-gallon drum on a steel pallet located adjacent to a vapor cleaner containing 1,1,1-TCA. PRC observed no nearby floor drains.
Date of Startup:	This unit began operation in 1982.

Date of Closure:	This unit is active.
Wastes Managed:	This unit managed waste freon until July 1992. The unit currently manages waste 1,1,1-TCA (F002). Wastes managed in this unit are transferred to the Container Storage Area (SWMU 5) for less than 90-day storage and are ultimately transported off site for recycling.
Release Controls:	This unit is located in a completely enclosed building that is equipped with a sprinkler system. PRC observed no nearby floor drains.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The unit contained one 55-gallon drum of virgin 1,1,1-TCA and one 55-gallon drum of virgin flux during the VSI. The unit contained no waste. PRC noted no evidence of release (see Photograph No. 19).
SWMU 12	**Freon Vapor Cleaner Waste Accumulation Area**
Unit Description:	This unit is located indoors in the manufacturing building near the cellular productions area. The unit consists of an area measuring about 4-feet by 4-feet. The unit contains a 55-gallon drum on a wooden pallet. The base of the unit is a tile floor. PRC observed no nearby floor drains.
Date of Startup:	This unit began operation in May 1980.
Date of Closure:	During the VSI, this unit was active. However, according to Mr. Howell, this unit became inactive on December 18, 1992, and waste contained in this unit was moved to the Container Storage Area (SWMU 5).
Wastes Managed:	This unit manages waste freon (F002) generated when circuit boards are cleaned using an adjacent vapor cleaner. Wastes from this unit

	are transferred to the Container Storage Area (SWMU 5) for less than 90-day storage and ultimately transported off site for recycling.
Release Controls:	This unit is located in a completely enclosed building that is equipped with a sprinkler system. PRC observed no nearby floor drains.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	This unit contained two 55-gallon drums of virgin freon and one partially filled drum of waste freon (F002). PRC noted no evidence of release (see Photograph No. 20).
SWMU 13	**1,1,1-TCA Parts Washers Waste Accumulation Area**
Unit Description:	This unit consists of an area indoors measuring about 3-feet by 3-feet in the tool room of the manufacturing building. The unit contains a 55-gallon drum located on a tile floor. PRC observed no nearby floor drains.
Date of Startup:	This unit began operation in about 1988.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages waste 1,1,1-TCA generated when the metal grinders used to mill machines are cleaned. The grinders are cleaned in two 12-gallon parts washers located adjacent to this unit. Wastes from this unit are transferred to the Container Storage Area (SWMU 5) for less than 90-day storage. The wastes are ultimately transported off site for recycling.
Release Controls:	This unit is located in a completely enclosed building that is equipped with a sprinkler system. PRC observed no nearby floor drains.

History of Documented Releases: No releases from this unit have been documented.

Observations: During the VSI, the unit contained no waste. PRC noted some staining on the tile base of this unit. PRC observed no nearby floor drains (see Photographs No. 21 and 22).

SWMU 14 **TCE Still and Still Bottoms Accumulation Area**

Unit Description: This indoor unit consists of an area measuring about 8-feet by 5-feet. This unit contains a steel vapor degreaser tank and a 55-gallon drum in front of a TCE still. The tank has a capacity of about 550 gallons. TCE still bottoms are piped from the still into the 550-gallon tank, and then pumped into the 55-gallon drum. The base of this unit is concrete. PRC observed no nearby floor drains.

Date of Startup: This unit began operation in about 1965.

Date of Closure: This unit is active.

Wastes Managed: This unit manages spent TCE (F001) and TCE still bottoms (F001) generated during the distillation of waste TCE. The wastes from this unit are transferred to the Container Storage Area (SWMU 5) for less than 90-day storage. The wastes are ultimately transported off site for recycling.

Release Controls: This unit is located in a completely enclosed building that is equipped with a sprinkler system. PRC observed no nearby floor drains.

History of Documented Releases: No releases from this unit have been documented.

Observations: The unit contained waste in its tank. However, PRC could not identify how much waste was in the completely closed tank. The

unit did not contain a 55-gallon drum. PRC observed staining on the concrete base of the unit and on the sides of the tank (see Photograph No. 23).

SWMU 15	**Paint Waste Accumulation Area**
Unit Description:	This unit consists of an area indoors measuring about 3-feet by 3-feet. This unit contains one 55-gallon drum. The base of this unit is a concrete floor. PRC observed a floor drain about 5 feet from the unit. According to Mr. Howell, the floor drain used to discharge to the city of Columbus sanitary sewer system but was permanently plugged with concrete in about 1987.
Date of Startup:	This unit began operation in 1959.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages waste paint containing toluene (F005). The waste accumulated in this unit is transferred to the Container Storage Area (SWMU 5) for less than 90-day storage and is ultimately transported off site for recycling.
Release Controls:	This unit is located in a completely enclosed building that is equipped with a sprinkler system. PRC observed a floor drain about 5 feet from this unit. According to Mr. Howell, the floor drain used to discharge to the sanitary sewer but was permanently plugged with concrete in about 1987.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The unit contained one partially filled 55-gallon drum of F005 waste paint. An adjacent 55-gallon drum contained detergent. PRC observed no evidence of release (see Photograph No. 24).

SWMU 16	**Molding Machines Used Oil Accumulation Area**
Unit Description:	This unit measures about 5-feet by 5-feet, and is located indoors in the manufacturing building near the injection molding machines. The unit contains two 55-gallon drums located on a wooden pallet. The base of this unit is concrete. PRC observed no nearby floor drains.
Date of Startup:	This unit began operation in 1959.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages nonhazardous used oil generated during the maintenance of injection molding machines. Wastes are transferred from this unit to the Container Storage Area (SWMU 5) for storage and are ultimately transported off site for fuel blending.
Release Controls:	This unit is located in a completely enclosed building that is equipped with a sprinkler system. PRC observed no nearby floor drains.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	This unit contained two 55-gallon drums of used oil. PRC noted no evidence of release (see Photograph No. 25).
SWMU 17	**Boiler House Used Oil Accumulation Area**
Unit Description:	This unit is located indoors in the boiler house. The unit consists of an area measuring about 10 feet by 4 feet and stores nonhazardous used oil in 55-gallon drums. The base of this unit is a concrete floor.

PRC observed a floor drain located about 10 feet from this unit. According to Mr. Howell, this drain empties into a collection sump that discharges to the city of Columbus sanitary sewer.

Date of Startup: This unit began operation in 1959.

Date of Closure: This unit is active.

Wastes Managed: This unit manages nonhazardous used oil generated during the maintenance of air compressors. Wastes are transferred from this unit to the Container Storage Area (SWMU 5) for storage and are ultimately transported off site for fuel blending.

Release Controls: The boiler house in which this unit is located is equipped with a sprinkler system and provides containment for this unit.

History of Documented Releases: No releases from this unit have been documented.

Observations: This unit contained one 55-gallon drum and one partially filled drum of nonhazardous used oil. PRC noted no evidence of release (see Photograph No. 26).

SWMU 18 **Tool Room Used Oil Accumulation Area**

Unit Description: This unit consists of a 55-gallon steel drum used to store used oil located indoors on a tile floor in the Tool Room. This area measures approximately 3-feet by 3-feet.

Date of Startup: This unit began operation in about 1988.

Date of Closure: This unit is active.

Wastes Managed: This unit manages nonhazardous used oil generated during the maintenance of drilling machines. Wastes from this unit are

	transferred to the Container Storage Area (SWMU 5) for storage and are ultimately transported off site for recycling.
Release Controls:	This unit is located in a completely enclosed building that is equipped with a sprinkler system. PRC observed no nearby floor drains.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	This unit contained one 55-gallon drum partially filled with used oil. PRC observed no evidence of release (see Photograph No. 27).
SWMU 19	**Original Container Storage Area**
Unit Description:	This outdoor unit was formerly located at the north end of the manufacturing building. According to Mr. Howell, this unit consisted of a 30-foot by 40-foot concrete pad surrounded by a concrete dike about 2 feet high.
Date of Startup:	This unit began operation in 1959.
Date of Closure:	EPA approved RCRA closure of this unit in November 1982.
Wastes Managed:	This unit managed used oil and waste solvents, including waste freon (F001) and waste PCE (F002).
Release Controls:	A concrete dike about 2 feet high surrounded this unit. Drainage from this area was directed into the Wastewater Pretreatment System (SWMU 1) (Western Electric, 1982a).
History of Documented Releases:	No releases from this unit have been documented.
Observations:	This unit has been removed. A building has been constructed over a portion of it, and the remaining portion has been covered with

asphalt and gravel. The area in which this unit was located is currently used for the storage of miscellaneous items (see Photograph No. 28).

SWMU 20	**Former Cyanide and Acid Waste Storage Area**
Unit Description:	This outdoor unit is located adjacent to the Wastewater Pretreatment System (SWMU 1) and consists of a 28-foot by 30-foot concrete pad surrounded by 6-inch curbing. The unit is divided into two parts, each with its own concrete drainage trench. One half of this unit was for the storage of cyanide wastes in drums and the other half was for the storage of acid wastes in drums.
Date of Startup:	This unit began operation in 1959.
Date of Closure:	From 1959 until November 1982, this unit stored wastes in drums for greater than 90 days. In November 1982, this unit underwent RCRA closure and was then used to store wastes for less than 90 days. According to Mr. Howell, this unit has been inactive since about 1985.
Wastes Managed:	This unit was used to store waste cyanide and acid, including cyanide residue (F008) and waste chromic acid residue (D001, D002, and D007). The wastes managed in this unit were ultimately transported off site for disposal.
Release Controls:	Drainage from the half of this unit that stored cyanide drained into an adjacent 12,000-gallon cyanide tank in SWMU 1. Drainage from the other half, which stored waste acid, was directed into an adjacent 7,100-gallon chromate surge tank at SWMU 1.
History of Documented Releases:	No releases from this unit have been documented.

Observations:	This unit contained no waste during the VSI. PRC observed no cracks in the concrete and no evidence of release (see Photograph No. 29).
SWMU 21	**Former Waste Ammonia Etching Solution Tank**
Unit Description:	This indoor unit consisted of an 8,000-gallon fiberglass tank on a concrete pad that was surrounded by a concrete dike about 4 feet high.
Date of Startup:	This unit began operation in about 1968.
Date of Closure:	This unit was removed in 1986.
Wastes Managed:	This unit managed waste ammonia etching solution (D002) generated when printed wiring boards were manufactured.
Release Controls:	According to Mr. Howell, this unit was located on a concrete base and was enclosed by a concrete dike about 4 feet high. This unit was located in a completely enclosed building that is equipped with a sprinkler system. PRC observed no nearby floor drains.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	PRC observed the location of this former unit, which now contains a metal chamber used to test various switches manufactured at the AT&T facility (see Photograph No. 30).
SWMU 22	**Former Waste Alcohol Evaporation Pond**
Unit Description:	This unit was located in the northern half of the facility along the eastern property line. This unit consisted of a depression, about 15 feet in diameter, in an open field (B&N, 1983).
Date of Startup:	This unit began operation in 1959.

Date of Closure:	This unit became inactive in 1978 according to facility representatives. During a compliance evaluation inspection, OEPA cited Western Electric for disposing of waste ethanol on the ground behind the facility in 1982. This area may have been SWMU 22.
Wastes Managed:	This unit managed waste alcohol generated during the manufacture of fuses. Waste alcohol was placed in this unit and allowed to evaporate to the atmosphere.
Release Controls:	This unit was not lined and had no release controls.
History of Documented Releases:	A Phase I and a Phase II hydrogeologic investigation conducted at the AT&T facility concluded that the Former Waste Alcohol Evaporation Pond (SWMU 22) was a potential source of ground-water contamination (B&N, 1983 and 1986). However, available information does not indicate that samples have been collected from this unit.
Observations:	PRC learned of this unit after the VSI. This unit was not mentioned during the VSI, and PRC did not observe this unit.

4.0 AREAS OF CONCERN

PRC identified one AOC during the PA/VSI. This AOC is discussed below; its location is shown in Figure 2A.

AOC 1 **Ground-water Contamination**

A Phase I and a Phase II hydrogeologic investigation conducted at the AT&T facility concluded that ground-water contamination beneath the AT&T facility was due to on-site sources. The Phase I hydrogeologic investigation report cited the facility's, underground pipelines, aboveground solvent pumps, and Former Waste Alcohol Evaporation Pond (SWMU 22) as potential sources of contamination (B&N, 1983 and 1986). The report also cited the facility's former USTs as potential sources of contamination. However, according to Mr. Howell, No. 2 fuel oil was the only material stored in on-site USTs.

The Phase I hydrogeologic investigation was conducted at the AT&T facility by B&N in response to a release of 1,1,1-TCA, TCE; and PCE to the ground water. The contaminants were detected in samples collected from a collection drain that extends around the foundation of the boiler house (see Section 2.4). TCE and 1,1,1-TCA were also detected in ground-water samples collected from a stand pipe used as an on-site monitoring well (B&N, 1983).

Additional ground-water sampling conducted by B&N in 1984 during a Phase II hydrogeologic investigation confirmed that ground water beneath the facility had been contaminated by solvents used at the AT&T facility (B&N, 1986). An April 1986 OEPA inspection report recommended that when completed, the Phase II hydrogeologic investigation report be reviewed by OEPA.

There is no evidence that OEPA has required AT&T to conduct any remedial action in response to the ground-water contamination. PRC considers the ground-water contamination an AOC because ground-water contamination may still be present at the facility.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified 22 SWMUs and 1 AOC at the AT&T facility. Background information on the facility's location; operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. The AOC is discussed in Section 4.0. Following are PRC's conclusions and recommendations for each SWMU and AOC. Table 3, at the end of this section, summarizes the SWMUs and AOCs at the facility and the recommended further actions.

SWMU 1 **Wastewater Pretreatment System**

Conclusions: This unit consists of several indoor and outdoor tanks that appeared to be in sound condition. The outdoor tanks are constructed of concrete and are lined with PVC or acid brick. The indoor tanks are constructed of steel. According to Mr. Howell, all of the tanks in this unit are emptied and inspected annually. A control room located in the wastewater treatment building constantly monitors the flow of waste into and out of this unit. This unit has no documented release history. The potential for a release from this unit to ground water, surface water, soil, and air is low.

Recommendations: PRC recommends no further action at this time.

SWMU 2 **Concentrated Waste Tanks**

Conclusions: This outdoor unit consists of three concrete tanks that appeared in sound condition. The tanks are lined with PVC and one of the tanks is also lined with rubber. This unit is equipped with pumps, and a control room located in the wastewater treatment building is used to constantly monitor the flow of waste into and out of this unit. This unit has no documented release history. The potential for a release from this unit to ground water, surface water, soil, and air is low.

Recommendations: PRC recommends no further action at this time.

SWMU 3 **Wastewater Treatment Sludge Roll-Off Box**

Conclusions: This indoor unit consists of a steel roll-off box lined with plastic. This unit and the concrete below it appeared in sound condition. The wastewater treatment building provides containment to this unit. No nearby floor drains were observed. The potential for a release from this unit to ground water, surface water, soil, and air is low.

Recommendations: PRC recommends no further action at this time.

SWMU 4 **Electroplating Collection Pits**

Conclusions: This unit consists of indoor concrete pits underlying all the tanks in the three electroplating areas. The unit is equipped with automatic pumps that activate when liquid wastes have accumulated in the unit. The wastes are pumped into the Wastewater Pretreatment System (SWMU 1) via the DAA, chromate, or cyanide piping networks. According to Mr. Howell, residue is annually cleaned from this unit. This unit has no documented release history. The potential for a release from this unit to ground water, surface water, soil, and air is low.

Recommendations: PRC recommends no further action at this time.

SWMU 5 **Container Storage Area**

This unit is divided into two sections, one roofed, the other open. The roofed section is outdoors, has a concrete base, is surrounded by 6-inch concrete curbing, and has a center collection trench. This unit manages hazardous waste in drums. The collection trench and the concrete curbing provide containment to this unit. The open unit manages scrap metal in 25 cubic yard roll-off boxes. PRC observed staining on the concrete base of the roofed section; however, no cracks were observed. This unit has no documented release history. The potential for a release from this unit to ground water, surface water, soil, and air is low.

Recommendations: PRC recommends no further action at this time.

SWMU 6 **Solder Dross Accumulation Area I**

Conclusions: This unit, containing a 1-gallon tin bucket and, periodically, a 55-gallon steel drum, is located in a completely enclosed building. PRC observed no nearby floor drains. This unit has no documented release history. The potential for a release from this unit to ground water, surface water, soil, and air is low.

Recommendations: PRC recommends no further action at this time.

SWMU 7 **Solder Dross Accumulation Area II**

Conclusions: This unit, consisting of a 1-gallon tin bucket and a 55-gallon steel drum, is located in a completely enclosed building. PRC observed no nearby floor drains. This unit has no documented release history. The potential for a release from this unit to ground water, surface water, soil, and air is low.

Recommendations: PRC recommends no further action at this time.

SWMU 8 **Solder Dross Accumulation Area III**

Conclusions: This unit, containing two tin 1-gallon buckets and a 55-gallon steel drum, is located in a completely enclosed building. PRC observed no nearby floor drains. This unit has no documented release history. The potential for a release from this unit to ground water, surface water, soil, and air is low.

Recommendations: PRC recommends no further action at this time.

SWMU 9 **Solder Paste Accumulation Area**

Conclusions: This unit, containing a 55-gallon steel drum, is located in a completely enclosed building. PRC observed no nearby floor drains. This unit has no documented release history. The potential for a release from this unit to ground water, surface water, soil, and air is low.

Recommendations: PRC recommends no further action at this time.

SWMU 10	**Flammable and Nonflammable Waste Accumulation Area**
Conclusions:	This unit is located in a completely enclosed room inside the manufacturing building. PRC observed no nearby floor drains. PRC observed staining on the concrete base of this unit; however, no cracks were observed. This unit has no documented release history. The potential for a release from this unit to ground water, surface water, soil, and air is low.
Recommendations:	PRC recommends no further action at this time.
SWMU 11	**1,1,1-TCA Vapor Cleaner Waste Accumulation Area**
Conclusions:	This unit, containing a 55-gallon drum, is located in a completely enclosed building. PRC observed no nearby floor drains. This unit has no documented release history. The potential for a release from this unit to ground water, surface water, soil, and air is low.
Recommendations:	PRC recommends no further action at this time.
SWMU 12	**Freon Vapor Cleaner Waste Accumulation Area**
Conclusions:	This unit, containing a 55-gallon drum, is located in a completely enclosed building. PRC observed no nearby floor drains. This unit has no documented release history. The potential for a release from this unit to ground water, surface water, soil, and air is low.
Recommendations:	PRC recommends no further action at this time.
SWMU 13	**1,1,1-TCA Parts Washers Waste Accumulation Area**
Conclusions:	This unit, containing a 55-gallon drum, is located in a completely enclosed building. PRC observed no nearby floor drains. This unit has no documented release history. The potential for a release from this unit to ground water, surface water, soil, and air is low.

Recommendations: PRC recommends no further action at this time.

SWMU 14 **TCE Still and Still Bottoms Accumulation Area**

Conclusions: This indoor unit containing a still, steel tank, and a 55-gallon drum is located in a completely enclosed building. PRC observed staining on the concrete base of this unit and on the sides of the tank. PRC observed no nearby floor drains. This unit has no documented release history. The potential for a release from this unit to ground water, surface water, soil, and air is low.

Recommendations: PRC recommends no further action at this time.

SWMU 15 **Paint Waste Accumulation Area**

Conclusions: This indoor unit consists of a 55-gallon drum in a completely enclosed building. PRC observed a floor drain about 5 feet from this unit. According to Mr. Howell, the floor drain formerly discharged to the sanitary sewer but was permanently plugged with concrete in about 1987. This unit has no documented release history. The potential for a release from this unit to ground water, surface water, soil, or air is low.

Recommendations: PRC recommends no further action at this time.

SWMU 16 **Molding Machines Used Oil Accumulation Area**

Conclusions: This unit, consisting of two 55-gallon drums, is located in a completely enclosed building. PRC observed no nearby floor drains. This unit has no documented release history. The potential for a release from this unit to ground water, surface water, soil, or air is low.

Recommendations: PRC recommends no further action at this time.

SWMU 17	**Boiler House Used Oil Accumulation Area**
Conclusions:	This unit, consisting of two 55-gallon drums in an area measuring about 10 feet by 4 feet, is located in the boiler house. PRC observed a nearby floor drain that, according to Mr. Howell, drains into a collection sump and is discharged to the city of Columbus sanitary sewer.
Recommendations:	PRC recommends no further action at this time.
SWMU 18	**Tool Room Used Oil Accumulation Area**
Conclusions:	This indoor unit, consisting of a 55-gallon drum, is located in a completely enclosed building. PRC observed no nearby floor drains. This unit has no documented release history. The potential for a release from this unit to ground water, surface water, soil, and air is low.
Recommendations:	PRC recommends no further action at this time.
SWMU 19	**Original Container Storage Area**
Conclusions:	This outdoor unit consisted of a concrete pad surrounded by a concrete dike about 2 feet high. Drainage from this unit was directed into the Wastewater Pretreatment System (SWMU 1). EPA approved closure of this unit in November 1982. This unit has no documented release history. The potential for a release from this removed unit to ground water, surface water, soil, and air is low.
Recommendations:	PRC recommends no further action at this time.
SWMU 20	**Former Cyanide and Acid Waste Storage Area**
Conclusions:	This outdoor unit consists of a concrete pad surrounded by 6-inch curbing. This unit is divided into two parts, each with its own concrete drainage trench. Drainage from the half of this unit that stored cyanide drains into an adjacent 12,000-gallon cyanide tank (SWMU 1). Drainage from the other half of the unit, which stored waste acid, drains into an adjacent

7,100-gallon chromate surge tank (SWMU 1). This unit has no documented release history. The unit was RCRA closed in 1982. The potential for a release from this unit to ground water, surface water, soil, or air is low.

Recommendations: PRC recommends no further action at this time.

SWMU 21 **Former Waste Ammonia Etching Solution Tank**

Conclusions: This unit consisted of an 8,000-gallon fiberglass tank on a concrete pad that was surrounded by a concrete dike about 4 feet high. This unit was located in a completely enclosed building. PRC observed no nearby floor drains. This unit has no documented release history. The potential for a release from this unit to ground water, surface water, soil, and air is low.

Recommendations: PRC recommends no further action at this time.

SWMU 22 **Former Waste Alcohol Evaporation Pond**

Conclusions: This outdoor unit consisted of a depression in an open field in the northern half of the facility along the eastern property line. This unit was about 15 feet in diameter. According to Mr. Howell, waste alcohol was placed in this unit and allowed to evaporate to the atmosphere.

The potential for a release from this unit to on-site soils and ground water is high. This unit was not lined and had no release controls. According to Mr. Howell, this unit was used from 1959 until 1978. This unit may have been used as late as 1982, however. This unit was not lined. Although alcohol is very volatile, this unit had no release controls to prevent waste alcohol, or constituents that may have been present in the waste alcohol, from migrating from on-site soils to ground water.

The potential for a release from this unit to surface water is moderate. If residual contamination exists in the on-site soils, the contaminants could potentially migrate to ground water and downgradient surface water bodies.

The potential for a release from this unit to air is low. According to facility representatives, AT&T has not used this unit since 1978. Any residual waste alcohol would have already evaporated to the atmosphere.

Recommendations: PRC recommends that soil samples be collected in this area and analyzed for the presence of volatile organic compounds (VOC). If soil contamination is detected, ground-water samples should also be collected and analyzed for VOCs and SVOCs.

AOC 1 **Ground-water Contamination**

Conclusions: Ground-water samples collected in 1982, 1983, and 1984 from a collection drain that extends around the foundation of the boiler house, and from on-site monitoring wells confirmed the presence of 1,1,1-TCA; TCE; and PCE in the ground water. A Phase I and a Phase II hydrogeologic investigation conducted at the AT&T facility concluded that ground-water contamination beneath the AT&T facility was due to on-site sources. The Phase I hydrogeologic investigation report cited the facility's underground pipelines, aboveground solvent pumps, and Former Waste Alcohol Evaporation Pond (SWMU 22) as potential sources of contamination (B&N, 1983 and 1986). The report also cited the facility's former USTs as a potential source of contamination. However, according to Mr. Howell, No. 2 fuel oil was the only material stored in on-site USTs.

Recommendations: PRC recommends that ground-water samples be collected from the boiler house collection drain, the six on-site monitoring wells, and from the two on-site stand pipes. These samples should be analyzed for VOCs and SVOCs. If contamination is detected, soil sampling should be conducted around the boiler house to further identify the source and extent of the contamination.

TABLE 3

SWMU AND AOC SUMMARY

SWMU	Dates of Operation	Evidence of Release	Recommended Further Action
1. Wastewater Pretreatment System	1959 to Present	None	None
2. Concentrated Waste Tanks	1959 to Present	None	None
3. Wastewater Treatment Sludge Roll-Off Box	1959 to Present	None	None
4. Electroplating Collection Pits	1959 to Present	None	None
5. Container Storage Area	1982 (estimated) to Present	None	None
6. Solder Dross Accumulation Area I	1977 (estimated) to Present	None	None
7. Solder Dross Accumulation Area II	1977 (estimated) to Present	None	None
8. Solder Dross Accumulation Area III	1977 (estimated) to present	None	None
9. Solder Paste Accumulation Area	1977 (estimated) to Present	None	None
10. Flammable and Nonflammable Waste Accumulation Area	1959 to Present	None	None
11. 1,1,1-TCA Vapor Cleaner Waste Accumulation Area	1982 to Present	None	None

TABLE 3 (Continued)

SWMU AND AOC SUMMARY

SWMU	Dates of Operation	Evidence of Release	Recommended Further Action
12. Freon Vapor Cleaner Waste Accumulation Area	May 1980 to December 1982	None	None
13. 1,1,1-TCA Parts Washers Waste Accumulation Area	1988 (estimated) to Present	None	None
14. TCE Still and Still Bottoms Accumulation Area	1965 to Present	None	None
15. Paint Waste Accumulation Area	1959 to Present	None	None
16. Molding Machines Used Oil Accumulation Area	1959 to Present	None	None
17. Boiler House Used Oil Accumulation Area	1959 to Present	None	None
18. Tool Room Used Oil Accumulation Area	1988 (estimated) to Present	None	None
19. Original Container Storage Area	1959 to November 1982	None	None
20. Former Cyanide and Acid Waste Storage Area	1959 to 1985 (estimated)	None	None

TABLE 3 (Continued)

SWMU AND AOC SUMMARY

SWMU	Dates of Operation	Evidence of Release	Recommended Further Action
21. Former Waste Ammonia Etching Solution Tank	1968 (estimated) to 1986	None	None
22. Former Alcohol Evaporation Pond	1959 to 1978	Wastes managed in this unit were directly released to on-site soils	Sample soil; if contamination is identified, sample ground water

AOC	Dates of Operation	Evidence of Release	Recommended Further Action
1. Ground-water Contamination	Not Applicable	Documented ground-water contamination	Sample ground water in boiler house collection drain, on-site monitoring wells, and on-site stand pipes; if contamination is identified, sample soil around boiler house

REFERENCES

American Telephone & Telegraph (AT&T), 1986. Letter from AT&T to the U.S. Environmental Protection Agency (EPA) with an updated Notification of Hazardous Waste Activity, June 2.

AT&T, 1990. 1989 Generator Annual Hazardous Waste Report for the AT&T Facility, February 27.

AT&T, 1992a. 1991 Generator Annual Hazardous Waste Report for the AT&T Facility, February 24.

AT&T, 1992b. Letter from Dale Howell, AT&T Environmental Engineer, to Margaret Flaherty, PRC Environmental Management, Inc. (PRC), as a follow-up to questions asked during the December 15 and 16 Visual Site Inspection, December 22.

AT&T, 1992c. List of machines that are permitted by or registered with the Ohio Environntal Protection Agency (OEPA), December 14.

Burgess & Niple, Ltd. (B&N), 1983. Phase II Hydrogeologic Investigation Report for Investigation Conducted at the American Telephone & Telegraph facility, October.

B&N, 1986. Phase II Hydrogeologic Investigation Report for Investigation Conducted at the American Telephone & Telegraph facility, March.

Environmental Protection Agency (EPA), 1982. Letter from EPA to the Western Electric Company (Western Electric) approving closure of the facility's container storage areas and changing the facility's status to that of a generator only, November 23.

Federal Emergency Management Agency (FEMA), 1987. Flood Insurance Rate Map for Franklin and Fairfield Counties, January 16.

OEPA, 1982. Letter from OEPA to Western Electric regarding June 28 inspection, July 29.

OEPA, 1983. OEPA letter to Western Electric discussing January 14, 1983 OEPA inspection, January 19.

OEPA, 1986. Field Activity Report discussing April 8, 1986 OEPA inspection of AT&T facility, April 21.

OEPA, 1991a. OEPA Report of Inspection for OEPA inspections conducted at the AT&T facility on February 20, 21, and 22, April 22.

OEPA, 1991b. National Pollutant Discharge Elimination System Permit, issued to the AT&T facility, effective September 17.

OEPA, 1991c. Letter from OEPA to AT&T discussing February 1991 facility inspection in which AT&T was cited for storing F006 wastewater treatment sludge in pervious roll-off boxes, July 25.

OEPA, 1992a. Letter from OEPA to AT&T discussing the documented release of F006 wastewater treatment sludge to soils underlying two roll-off boxes, January 16.

OEPA, 1992b. OEPA interoffice memorandum discussing soil remediation conducted in response to the release of F006 wastewater treatment sludge, July 30.

OEPA, 1993. Computer print out of OEPA Emergency Response Pollution Incidents occurring at the AT&T facility between January 1978 and December 1992, January 15.

PRC, 1993a. Telephone conversation between Margo Fulmer, ODNR, and Margaret Flaherty, PRC, regarding surface water usage near the AT&T facility, January 8.

PRC, 1993b. Telephone conversation between Dale Howell, AT&T, and Margaret Flaherty, PRC January 13.

PRC, 1993c. Telephone conversation between Barbara Burgman, City of Columbus Economic Development, and Margaret Flaherty, PRC, January 11.

PRC, 1993d. Telephone conversation between Jack Henry, ODNR, and Margaret Flaherty, PRC, regarding wetlands near the AT&T facility, January 8.

PRC, 1993e. Telephone conversation between Wes Drake, OEPA Emergency Response Division, and Margaret Flaherty, PRC, January 17.

PRC, 1993f. Telephone conversation between Don Cavote, OEPA Division of Air Pollution Control, and Margaret Flaherty, PRC, February 10.

U.S. Department of Commerce (USDC), 1968. Climatological Data Report, Annual Summary with Comparative Data for Columbus, Ohio.

U.S. Geological Survey (USGS), 1985. Reynoldsburg, Ohio, Quadrangle, 7.5-Minute Series.

Western Electric, 1980a. Notification of Hazardous Waste Activity, August 18.

Western Electric, 1980b. Resource Conservation and Recovery Act (RCRA) Part A Permit Application, November 14.

Western Electric, 1982a. Letter from Western Electric to EPA describing changes to be made to the facility's Part A Permit Application and stating closure of the facility's container storage areas, October 29.

Western Electric, 1982b. Letter from Western Electric to OEPA in response to violations noted during June 28 inspection, September 27.

ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
OH	OHD 004 282 703

II. SITE NAME AND LOCATION

01 SITE NAME *(Legal, common, or descriptive name of site)*	02 STREET, ROUTE NO. OR SPECIFIC LOCATION IDENTIFIER
American Telephone and Telegraph (AT&T)	6200 East Broad Street

03 CITY	04 STATE	05 ZIP CODE	06 COUNTY	07 COUNTY CODE	08 CONG DIST
Columbus	OH	43213	Franklin		

09 COORDINATES: LATITUDE	LONGITUDE
39° 38' 30" N	82° 50' 16" W

10 DIRECTIONS TO SITE *(Starting from nearest public road)*
Take U.S. Interstate 270 South to Broad Street; facility is about 0.75 mile east of U.S. Interstate 270

III. RESPONSIBLE PARTIES

01 OWNER *(If known)*	02 STREET *(Business, mailing residential)*
AT&T	6200 East Broad Street

03 CITY	04 STATE	05 ZIP CODE	06 TELEPHONE NUMBER
Columbus	OH	43213	(614) 860-2000

07 OPERATOR *(If known and different from owner)*	08 STREET *(Business, mailing, residential)*

09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER

13 TYPE OF OWNERSHIP *(Check one)*
☒ A. PRIVATE ☐ B. FEDERAL: _____ *(Agency Name)* ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL
☐ F. OTHER _____ *(Specify)* ☐ G. UNKNOWN

14. OWNER/OPERATOR NOTIFICATION ON FILE *(Check all that apply)*
☐ A. RCRA 3010 DATE RECEIVED: 08/18/80 *(MONTH DAY YEAR)* ☐ B. UNCONTROLLED WASTE SITE *(CERCLA 103 c)* DATE RECEIVED: / / *(MONTH DAY YEAR)* ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION
☒ YES DATE 12/15/92
☐ NO

BY *(Check all that apply)*
☐ A. EPA ☒ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR
☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____ *(Specify)*

CONTRACTOR NAME(S): PRC Environmental Management, Inc. (PRC)

02 SITE STATUS *(Check one)*
☐ A. ACTIVE ☐ B. INACTIVE ☐ C. UNKNOWN

03 YEARS OF OPERATION
1959 *(BEGINNING YEAR)* | Present *(ENDING YEAR)* ☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED Waste tetrachloroethylene (PCE) was formerly managed at the facility. The facility currently manages pretreated process wastewater; concentrated waste acid and sodium hudroxide; wastewater treatment sludge; waste chromic acid; waste sodium hydroxide; waste zinc cyanide; zinc and copper plating filters; nickel chloride residue; waste solder dross; waste solder paste; waste alcohol; waste 1,1,1-Trichloroethane (1,1,1-TCA); waste butyl carbitol; spent trichloroethylene (TCE); TCE still bottoms; waste paint; used oil; and polychlorinated biphenyls.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION Ground-water contamination has been documented at the AT&T facility. Ground-water samples collected in 1982, 1983, and 1984 on-site confirmed the presence of 1,1,1-TCA; TCE; and PCE. Ground-water contamination caused from an unidentified source may be present at the facility. A waste alcohol evaporation pond was used at the facility from 1959 until about 1978. Waste alcohol placed in this unlined unit came in direct contact with on-site soils. Residual soil contamination may be present.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION *(Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)*

☐ A. HIGH *(Inspection required promptly)* ☒ B. MEDIUM *(Inspection required)* ☐ C. LOW *(Inspect on time-available basis)* ☐ D. NONE *(No further action needed; complete current disposition form)*

INFORMATION AVAILABLE FROM

01 CONTACT	02 OF *(Agency/Organization)*	03 TELEPHONE NUMBER
Kevin Pierard	U.S. EPA	(312) 886-4448

04 PERSON RESPONSIBLE FOR ASSESSMENT	05 AGENCY	06 ORGANIZATION	07 TELEPHONE NUMBER	08 DATE
Margaret B. Flaherty		PRC	(312) 856-8700	12/16/92 *(MONTH DAY YEAR)*

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 2 - WASTE INFORMATION

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
OH	OHD 004 282 703

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES *(Check all that apply)*

- ☐ A. SOLID
- ■ B. POWDER, FINES
- ■ C. SLUDGE
- ☐ E. SLURRY
- ■ F. LIQUID
- ☐ G. GAS
- ■ D. OTHER _____ *(Specify)*

02 WASTE QUANTITY AT SITE
(Measures of waste quantities must be independent)

TON _____

CUBIC YARDS _____

NO. OF DRUMS 60

03 WASTE CHARACTERISTICS *(Check all that apply)*

- ■ A. TOXIC
- ■ B. CORROSIVE
- ■ C. RADIOACTIVE
- ■ D. PERSISTENT
- ■ E. SOLUBLE
- ☐ F. INFECTIOUS
- ■ G. INFLAMMABLE
- ■ H. IGNITABLE
- ■ I. HIGHLY VOLATILE
- ☐ J. EXPLOSIVE
- ☐ K. REACTIVE
- ☐ L. INCOMPATIBLE
- ☐ M. NOT APPLICABLE

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE	6	CY	F006 Wastewater treatment sludge
OLW	OILY WASTE	1650	GA	Nonhazardous used oil
SOL	SOLVENTS	660	GA	1,1,1-TCA; TCE; and freon
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS			
IOC	INORGANIC CHEMICALS			
ACD	ACIDS	7,000	GA	Electroplating waste acid and waste sodium hydroxide
BAS	BASES	500	GA	in wastewater pretreatment
MES	HEAVY METALS	550	GA	D008 Waste solder dross

IV. HAZARDOUS SUBSTANCES *(See Appendix for most frequently cited CAS Numbers)*

CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION
SOL	Trichloroethylene	79-01-6	55-gallon drums/off-site recycling		
SOL	Trichloroethane	25323-89-1	55-gallon drums/off-site recycling		
ACD	Hydrochloric Acid	7647-01-0	Wastewater pretreatment system		
BAS	Sodium Hydroxide	1310-73-2	Wastewater pretreatment system		

V. FEEDSTOCKS *(See Appendix for CAS Numbers)*

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS	Nickel	7440-02-0	FDS		
FDS	Toluene	108-88-3	FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION *(Cite specific references; e.g., state files, sample analysis, reports)*

S. EPA Region 5 files
EPA files
Site visit

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
OH	OHD 004 282 703

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ■ A. GROUNDWATER CONTAMINATION 02 ■ OBSERVED 1982, 1983 and 1984 ■ POTENTIAL □ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: Unknown 04 NARRATIVE DESCRIPTION

In 1982 and 1983, ground-water sampling conducted at the AT&T facility during a Phase I Hydrogeologic Investigation revealed the presence of 1,1,1-TCA; TCE; and PCE in the ground water. In 1984, these constituents were detected in the ground water during a Phase II Hydrogeologic Investigation. Ground water is not a primary source of drinking water in the area. The city of Columbus provides water to nearby residences

01 ■ B. SURFACE WATER CONTAMINATION 02 ■ OBSERVED (DATE:_____) ■ POTENTIAL □ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: Unknown 04 NARRATIVE DESCRIPTION

A waste alcohol evaporation pond was used at the facility from 1959 until about 1978. Waste alcohol came in direct contact with on-site soils when placed in this unlined unit. In addition, the source of ground-water contamination at the facility has not been identified.

01 ■ C. CONTAMINATION OF AIR 02 ■ OBSERVED (DATE:_____) □ POTENTIAL □ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

None.

01 ■ D. FIRE/EXPLOSIVE CONDITIONS 02 ■ OBSERVED (DATE:_____) ■ POTENTIAL □ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

None.

01 □ E. DIRECT CONTACT 02 □ OBSERVED (DATE:_____) □ POTENTIAL □ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

None.

01 ■ F. CONTAMINATION OF SOIL 02 □ OBSERVED (DATE:_____) ■ POTENTIAL □ ALLEGED
03 AREA POTENTIALLY AFFECTED: Unknown (Acres) 04 NARRATIVE DESCRIPTION

A waste alcohol evaporation pond was used at the facility from 1959 until about 1978. Waste alcohol came in direct contact with on-site soils when placed in this unlined unit. In addition, the source of ground-water contamination at the facility has not been identified.

01 ■ G. DRINKING WATER CONTAMINATION 02 ■ OBSERVED (DATE:_____) □ POTENTIAL ■ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

None.

01 □ H. WORKER EXPOSURE/INJURY 02 ■ OBSERVED (DATE:_____) ■ POTENTIAL □ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

None.

01 ■ I. POPULATION EXPOSURE/INJURY 02 □ OBSERVED (DATE:_____) □ POTENTIAL □ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

None.

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
OH	OHD 004 282 703

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA 02 ☐ OBSERVED (DATE:_____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

None.

01 ☐ K. DAMAGE TO FAUNA 02 ☐ OBSERVED (DATE:_____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

None.

01 ☐ L. CONTAMINATION OF FOOD CHAIN 02 ☐ OBSERVED (DATE:_____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

None.

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES 02 ☐ OBSERVED (DATE:_____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

None.

01 ☐ N. DAMAGE TO OFF-SITE PROPERTY 02 ☐ OBSERVED (DATE:_____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

None.

01 ☐ O. CONTAMINATION OF SEWERS, DRAINS, WWTPS 02 ☐ OBSERVED (DATE:_____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

None.

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING 02 ☐ OBSERVED (DATE:_____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

None.

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

None.

III. TOTAL POPULATION POTENTIALLY AFFECTED:_____

IV. COMMENTS

V. SOURCES OF INFORMATION *(Cite specific references; e.g., state files, sample analysis, reports)*

U.S. EPA Region 5 files
OEPA files
Site visit

ATTACHMENT B

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

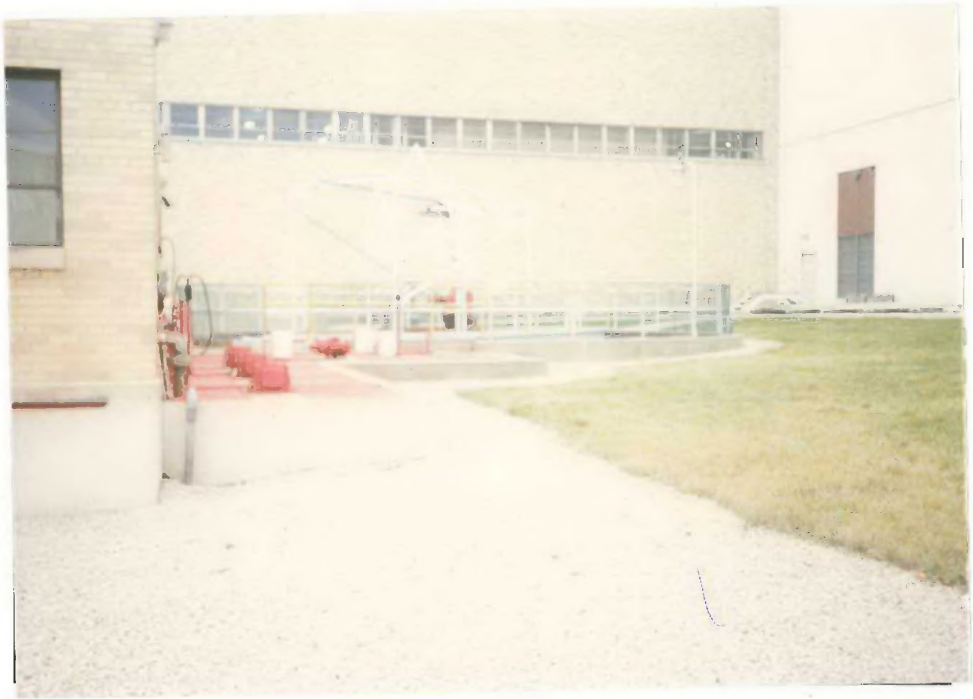
American Telephone and Telegraph (AT&T)
6200 East Broad Street
Columbus, Ohio 43213
OHD 004 282 703

Dates:	December 15 and 16, 1992
Primary Facility Representative:	Dale Howell, Environmental Engineer
Representative Telephone No.:	614/860-5143
Additional Facility Representatives:	Barbara Thompson, Environmental Engineer
Inspection Team:	Margaret Flaherty, PRC Environmental Management, Inc. (PRC) Kristine Kruk, PRC
Photographer:	Kristine Kruk
Weather Conditions:	The weather on both days was mild, partly cloudy, and about 40 °F
Summary of Activities:	On December 15, 1992, the visual site inspection (VSI) began at 9:20 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, solid wastes generated, and release history. Facility representatives provided the inspection team with copies of requested documents. The meeting adjourned at 5:35 p.m. On December 16, 1992, the VSI began at 9:00 a.m. Mr. Howell answered questions regarding information that was discussed with the inspection team on December 15, 1992. The VSI tour began at 10:30 a.m. The areas inspected included the Wastewater Pretreatment System (SWMU 1); the Concentrated Waste Tanks (SWMU 2); the Wastewater Treatment Sludge Roll-Off Box (SWMU 3); the Electroplating Collection Pits (SWMU 4); the Container Storage Area (SWMU 5); Solder Dross Accumulation Area I (SWMU 6); Solder Dross Accumulation Area II (SWMU 7); Solder Dross Accumulation Area III (SWMU 8); the Solder Paste Accumulation Area (SWMU 9); the Flammable and Nonflammable Waste Accumulation Area (SWMU 10); the 1,1,1-TCA Vapor Cleaner Waste Accumulation Area (SWMU 11); the Freon Vapor Cleaner Waste Accumulation Area (SWMU 12); the 1,1,1-TCA Parts Washers Waste Accumulation Area (SWMU 13); the TCE Still and Still Bottoms Accumulation Area (SWMU 14); the Paint Waste Accumulation Area (SWMU 15); the Molding Machines

Used Oil Accumulation Area (SWMU 16); the Boiler House Used Oil Accumulation Area (SWMU 17); the Tool Room Used Oil Accumulation Area (SWMU 18); the Original Container Storage Area (SWMU 19); the Former Waste Cyanide and Acid Storage Area (SWMU 20); and the Former Waste Ammonia Etching Solution Tank (SWMU 21). Photographs were taken of these SWMUs. The inspection team did not inspect the Former Waste Alcohol Evaporation Pond (SWMU 22). This unit was not discussed during the VSI and PRC did not learn of this unit until after the VSI.

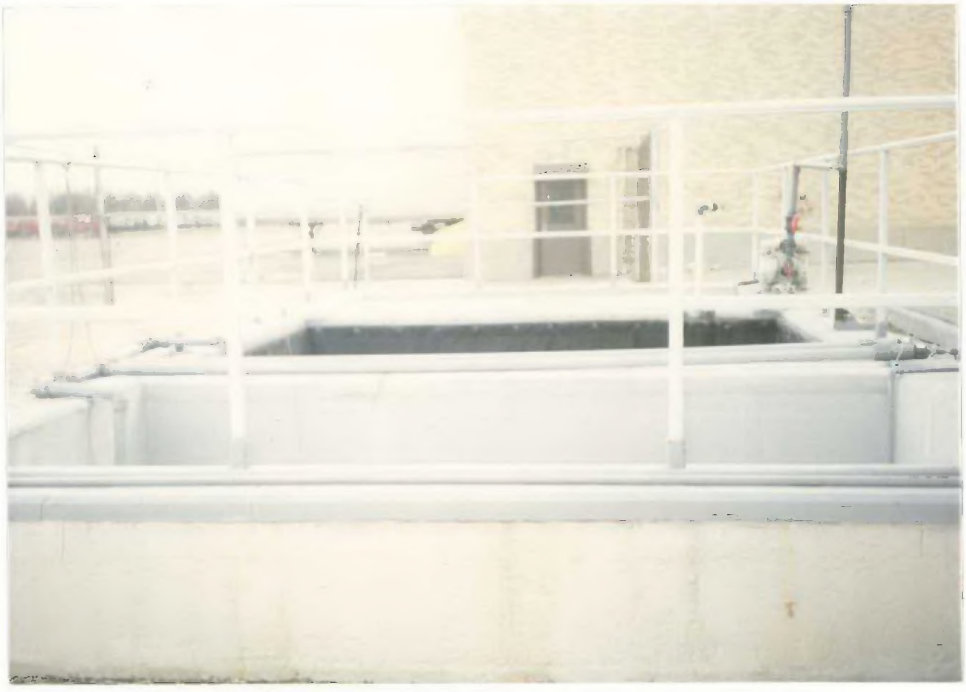
The tour concluded at 3:45 p.m., after which the inspection team held an exit meeting with facility representatives. The VSI was completed and the inspection team left the facility at 4:15 p.m.

Photograph No. 1 Location: SWMU 1
Orientation: West Date: 12/16/92
Description: Acid and alkali surge tank, chromate surge tank, and chromate tank in the Wastewater Pretreatment System (SWMU 1)

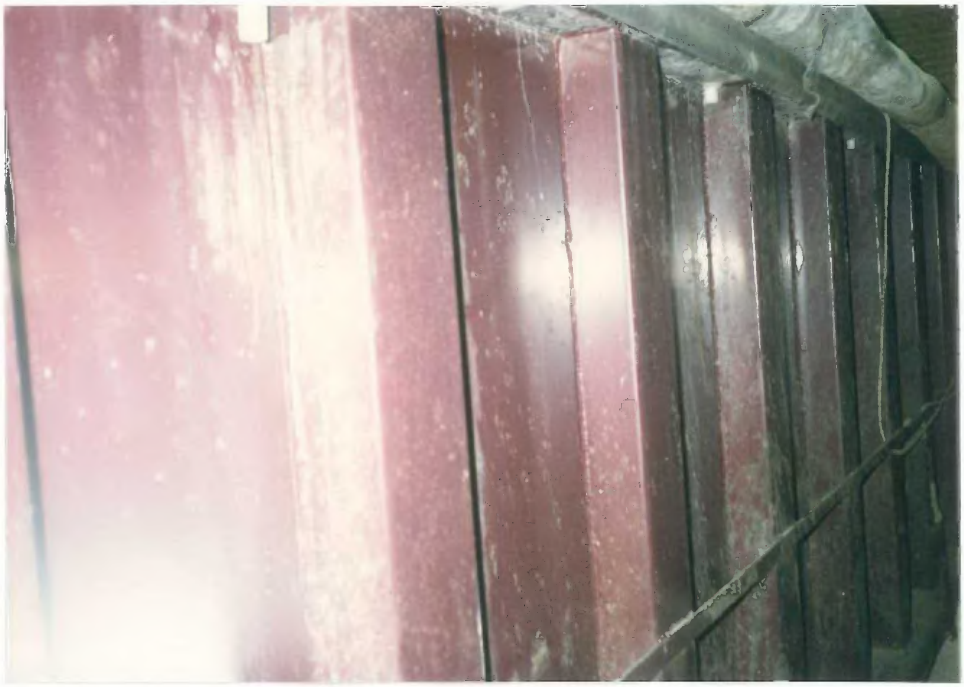


Photograph No. 2 Location: SWMU 1
Orientation: Southwest Date: 12/16/92
Description: 140,000-gallon clarifier and neutralization tanks (SWMU 1); neutralization tanks are covered with red metal grating on left side of photograph

Photograph No. 3 Location: SWMU 1
Orientation: East Date: 12/16/92
Description: 20,000-gallon sludge holding tank in basement of wastewater treatment building



Photograph No. 4 Location: SWMU 2
Orientation: South Date: 12/16/92
Description: Concentrated Waste Tanks (SWMU 2); the two closest tanks store waste acid; the furthest tank stores waste sodium hydroxide



Photograph No. 5 Location: SWMU 3
Orientation: East Date: 12/16/92
Description: Wastewater Treatment Sludge Roll-off Box (SWMU 3) in wastewater treatment building used to store F006 wastewater treatment sludge

Photograph No. 6 Location: SWMU 3
Orientation: Down Date: 12/16/92
Description: F006 wastewater treatment sludge after falling from filter press

Photograph No. 7 Location: SWMU 4
Orientation: West Date: 12/16/92
Description: Electroplating tanks used in conjunction with the programmable hoist plater; Electroplating Collection Pits (SWMU 4) are located below the tanks and the metal grating

Photograph No. 8 Location: SWMU 4
Orientation: East Date: 12/16/92
Description: Electroplating tank used in conjunction with the automatic nickel and chrome plater

Photograph No. 9 Location: SWMU 4
Orientation: North Date: 12/16/92
Description: Electroplating tanks used in conjunction with the acid-tin barrel plater; a portion of SWMU 4 is located at left side of photograph

Photograph No. 10 Location: SWMU 5
Orientation: Northeast Date: 12/16/92
Description: Container Storage Area (SWMU 5) used to store nonhazardous used oil and all hazardous wastes generated at the facility

Photograph No. 11 Location: SWMU 5
Orientation: North Date: 12/16/92
Description: 55-gallon drums containing solder and PCB wastes in SWMU 5

Photograph No. 12 Location: SWMU 6
Orientation: Northwest Date: 12/16/92
Description: Solder Dross Accumulation Area I (SWMU 6); 55-gallon drum is periodically located within taped section of floor on right side of photograph

Photograph No. 13 Location: SWMU 7
Orientation: West Date: 12/16/92
Description: 1-gallon bucket in Solder Dross Accumulation Area II (SWMU 7)

Photograph No. 14
Orientation: East
Description: 55-gallon drum in SWMU 7

Location: SWMU 7
Date: 12/16/92

Photograph No. 15
Orientation: West
Description: Two partially filled 1-gallon buckets in SWMU 8 on top shelf; four buckets on bottom shelf are empty

Location: SWMU 8
Date: 12/16/92

Photograph No. 16
Orientation: East
Description: 55-gallon drum in SWMU 8

Location: SWMU 8
Date: 12/16/92

Photograph No. 17
Orientation: South
Description: 55-gallon drum in Solder Paste Accumulation Area (SWMU 9)

Location: SWMU 9
Date: 12/16/92

Photograph No. 18 Location: SWMU 10
Orientation: North Date: 12/16/92
Description: Flammable and Nonflammable Waste Accumulation Area (SWMU 10) in oil storage room

Photograph No. 19 Location: SWMU 11
Orientation: East Date: 12/16/92
Description: 1,1,1-TCA Vapor Cleaner Waste Accumulation Area (SWMU 11) containing no waste; the two 55-gallon drums in photograph contain virgin material

Photograph No. 20 Location: SWMU 12
Orientation: South Date: 12/16/92
Description: Freon Vapor Cleaner Waste Accumulation Area (SWMU 12) containing one partially filled 55-gallon drum of waste freon

Photograph No. 21 Location: SWMU 13
Orientation: North Date: 12/16/92
Description: One of two 12-gallon parts washers located adjacent to 1,1,1-TCA Parts Washers Accumulation Area (SWMU 13) in the tool room

Photograph No. 22 Location: SWMU 13
Orientation: South Date: 12/16/92
Description: 12-gallon parts washer adjacent to SWMU 13; 55-gallon drum is periodically located on the right side of this parts washer

Photograph No. 23 Location: SWMU 14
Orientation: West Date: 12/16/92
Description: TCE Still and Still Bottoms Accumulation Area (SWMU 14); the 55-gallon drum is periodically located next to tank, which is on the left side of the photograph

Photograph No. 24 Location: SWMU 15
Orientation: North Date: 12/16/92
Description: Paint Waste Accumulation Area (SWMU 15) in maintenance building; the 55-gallon drum on the left with covered funnel on top contains waste paint (F005), and the drum on the right contains product detergent

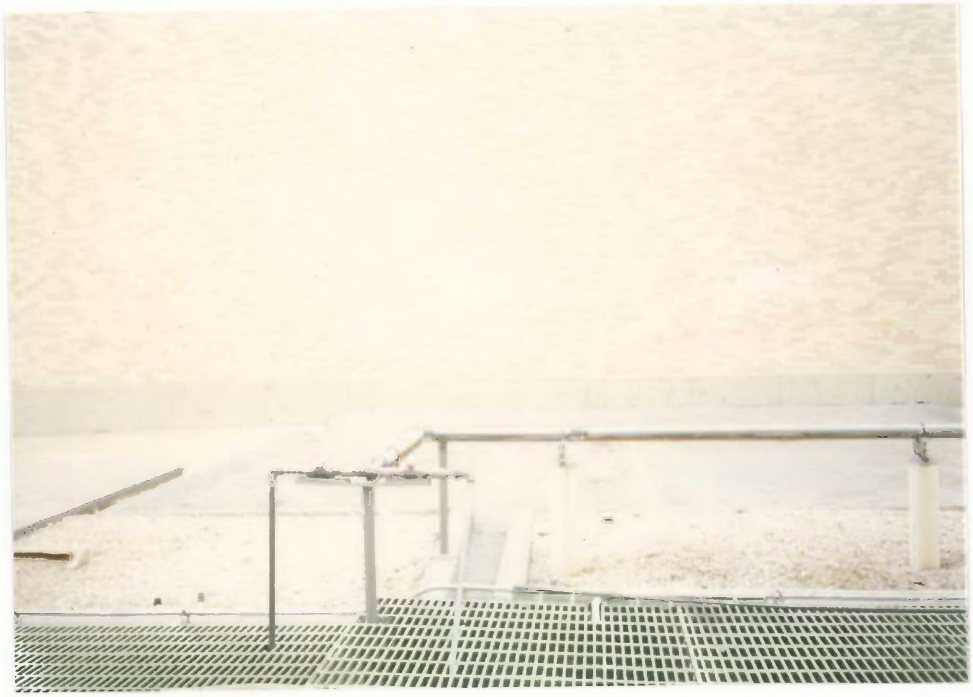
Photograph No. 25 Location: SWMU 16
Orientation: North Date: 12/16/92
Description: Molding Machines Used Oil Accumulation Area (SWMU 16) containing two partially filled 55-gallon drums of used oil

Photograph No. 26 Location: SWMU 17
Orientation: Date: 12/16/92
Description: Boiler House Used Oil Accumulation Area (SWMU 17) containing one 55-gallon and one partially filled 55-gallon drum of used oil; two drums on left contain used oil, other drums contain virgin oil

Photograph No. 27 Location: SWMU 18
Orientation: East Date: 12/16/92
Description: Tool Room Used Oil Accumulation Area (SWMU 18) containing one partially-filled 55-gallon used oil drum

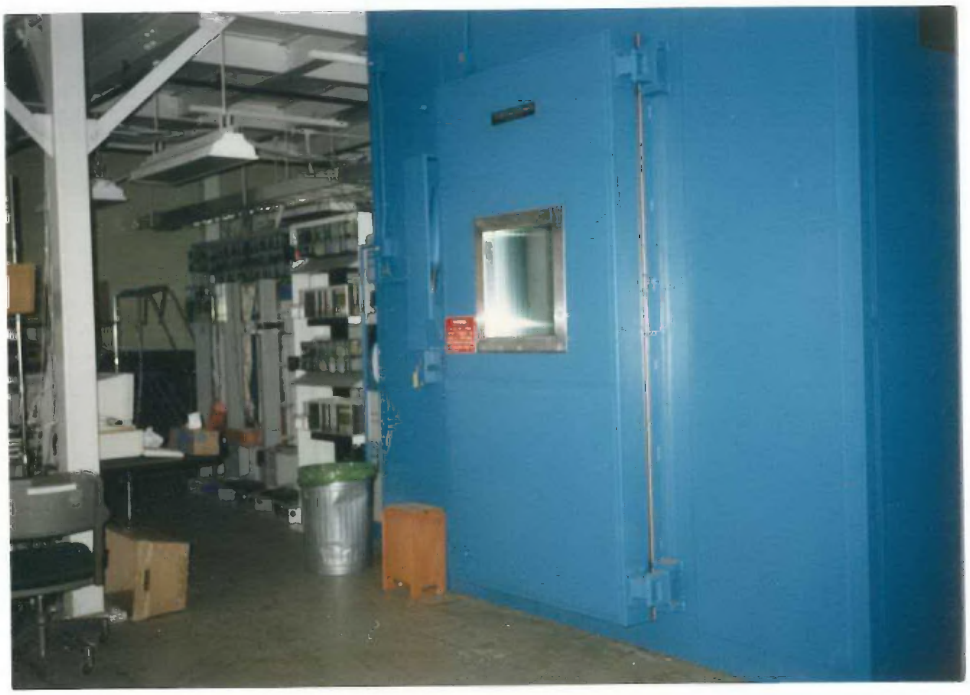
Photograph No. 28
Orientation: Southeast
Description: Location of Original Container Storage Area (SWMU 19); a building has been constructed over a portion of this unit

Location: SWMU 19
Date: 12/16/92



Photograph No. 29
Orientation: South
Description: Former Waste Cyanide and Acid Storage Area (SWMU 20); located behind green grates, which cover a portion of SWMU 1

Location: SWMU 20
Date: 12/16/92



Photograph No. 30 Location: SWMU 21
Orientation: Southwest Date: 12/16/92
Description: Location of Former Waste Ammonia Etching Solution Tank (SWMU 21) in manufacturing building

ATTACHMENT D
GROUND-WATER SAMPLING RESULTS

Table 2 (continued)

Parameter	T.D. 8/22/83	T.D. 8/22/83	B&N T.D. 9/15/83	W.E. T.D. 9/15/83	24" SP 5/9/83	B&N 24" SP 9/15/83	W.E. 24" SP 9/15/83	3" SP 5/9/83	SO 9/15/83	B&N FAEP 7/29/83
1,1,1-trichloroethane	20.9	15.0	13.9	37.4	N.D.	.075	N.D.	28.8	0.139	
Trichloroethylene	2.7	2.1	2.9	6.6	N.D.	<.010	N.D.	22.8	0.058	
Perchloroethylene	1.6	3.6	2.9	10.4	N.D.	<.010	N.D.	0.04	0.034	
Taluene										
TOC			28			16				
COD			18			6				1,200
Conductivity, umhos			3,500			1,830				1,600
pH, S.U.			7.7			7.5				5.6
Hardness										
Chloride										
Sulfate										
Chromium, Hexavalent										

GROUND-WATER SAMPLING RESULTS (Continued)

	Parameter	Sample Collected 04/18/84	Sample Collected 06/11/84	Sample Collected 09/12/84	Sample Collected 12/11/84
Collection Drain	PCE	1.6/7.48	4.1/6.9	4.1/5.38	2.0/-
	TCE	1.4/4.74	3.4/4.6	3.3/2.99	1.8/-
	1,1,1-TCA	8.8/2.90	25/31.4	21/20.97	14/-

Note:

[1] Available information does not specify the location of monitoring wells

[2] ND = Not detected

[3] Samples collected by Burgess and Niple, Ltd./Sample collected by AT&T

[4] - = Analysis not performed

Source: B&N, 1986

GROUND-WATER SAMPLING RESULTS

Results in milligram/liter

	Parameter	Sample Collected 04/18/84	Sample Collected 06/11/84	Sample Collected 09/12/84	Sample Collected 12/11/84
Monitoring well (MW)-1[1] (upgradient)	PCE	[2]ND	[3]ND/ND	ND/ND	ND/-[4]
	TCE	ND	ND/ND	ND/ND	ND/-
	1,1,1-TCA	ND	ND/ND	ND/ND	ND/-
MW-2	PCE	ND/0.67	0.49/0.28	ND/0.53	0.31/-
	TCE	1.4/1.92	0.80/0.38	0.53/0.70	0.63/-
	1,1,1-TCA	15.0/17.43	13.0/11.2	11/12.25	14.0/-
MW-3 (South of boiler house)	PCE	0.032/0.040	0.058/0.030	0.041/0.060	0.026/-
	TCE	0.034/0.040	0.044/0.030	0.052/0.050	0.037/-
	1,1,1-TCA	0.140/0.150	0.230/0.180	0.250/0.280	0.140/-
MW-4	PCE	ND/ND	ND/ND	ND/ND	ND/-
	TCE	ND/ND	ND/ND	ND/ND	ND/-
	1,1,1-TCA	ND/ND	ND/ND	ND/ND	ND/-
MW-5	PCE	ND	ND/0.003	ND/ND	ND/-
	TCE	0.005	ND/0.020	ND/ND	0.004/-
	1,1,1-TCA	0.0009	ND/0.004	ND/ND	0.010/-

Table 2

Groundwater Quality

Results in mg/l

Parameter	Date/Location T.D. 10/11/82	T.D. 10/19/82	T.D. 10/27/82	T.D. 12/8/82	T.D. 4/19/83	T.D. 5/2/83	T.D. 5/25/83	B&N T.D. 7/29/83	W.E. T.D. 7/29/83
1,1,1-trichloroethane					19.2	17.4	21	5.4	15.2
Trichloroethylene	5-6	5.2	11.4	14.2	4.4	3.8	4.8	1.1	3.1
Perchloroethylene	2.0	1.7	9.6	13.1	4.9	3.9	3.8	<0.8	1.4
Toluene	0.1	0.09	0.2	0.3					
TOC								40	
COD								52	
Conductivity, umhos								1,000	
pH, S.U.	7.05							8.4	
Hardness		583							
Chloride	320								
Sulfate	17								
Chromium, Hexavalent	0.02								

T.D. - Toe drain discharging to sump is collection drain in boiler house

24" SP - 24-inch standpipe

3" SP - 3-inch standpipe

S.D. - Sanitary outfall

FAEP - Former alcohol evaporation pond

N.D. - Not detected

B&N - Collected and analyzed by Burgess & Niple, Limited

W.E. - Collected by Burgess & Niple, Limited; analyzed by Western Electric

Note: Unless otherwise indicated, all samples were collected and analyzed by Western Electric.

SOURCE: B&N, 1983

SAA, ON WOODEN PALLET ADJ. TO WAVE SOLDER MACHINE IN CELLULAR EAST.

PHOTO #5 – 1 gal. STEEL PAN ADJ. TO WAVE SOLDER MACHINE IN CELLULAR AREA NEAR, ON STEEL TRAY, TILE FLOOR

- NETWORK SYSTEMS -

PHOTO #6 – 2½ FULL 1 gal. PANS ADJ. TO SOLDER MACHINE USED TO USE PERC. (EMPTY PAN ON BOTTOM OF CART) - WEST

PHOTO #7 – 1 55 gal. DRUM OF WASTE SOLDER DROSS - EAST, ≈ 20' SOUTH FROM PHOTO #6

P. Flaherty 11.19.97

PHOTO #8 – 1 55 gal. DRUM OF FOC FREON, ON WOODEN PALLET, TILE FLOOR

- PHOTO #9 - LOCATION OF WHERE WASTE 111 TCA WOULD BE STORED (SAA) CURRENTLY NONE ADJACENT TO B-5 VAPOR CLEANER IN PART #42, ON STEEL PALLET

- PHOTO #10 – PROGRAMMER HOIST MACHINE (COPPER, NICKEL, ETC.) SHOWING PIPE – DAA, CHROME, ETC.

- CYANIDE HAS ITS OWN PIT

- PHOTO #11 – NICKEL - CHROME PLATER, SHOWING PIPES THAT

P. Flaherty

DISCHARGE TO WWT - i.e. DILUTE CAUSTIC, DILUTE ACID, HCL, - EAST

PHOTO #12 - ACID TO PLATING, (PLATING ON RIGHT, PIPE TO WWT ON LEFT NORTH

- FLOOR SUMPS ALL DISCHARGE TO WWT

PHOTO #13 - TCE DEGREASER, LOCATION WHERE DRUM STOOD FRONT OF SINK

- "CAN" DRAINS FROM SINK INTO TANK BELOW SINK, TANK SIZE ~ 3' x 3.5' x 7.0' - STEEL, CONC. BASE, ADJACENT TO WOOD-BLOCK SURFACE, WEST

P. Flaherty 12/16/92

PHOTO #14 - 2 55 GALLON WASTE OIL DRUMS OUTSIDE DOOR IN MACHINE AREA - NORTH

PHOTO #15 - DRILLING OPERATIONS IN TOOL ROOM GENERATE WASTE OIL - WASTE OIL SAA - EAST, SAA ALSO USED FOR 111 TCA SAA

PHOTO #16 - 2 PARTS CLEANING UNITS IN TOOL ROOM:

- PHOTO #15 - NORTH P.F. ~12 gal., USES 111 TCA

PHOTO #17 - ~12 gal. PARTS CLEANER UNIT IN TOOL ROOM THAT USES 111 TCA; SOMETIMES 55 gal. (SAA) IS ADD. TO THIS UNIT FOR WASTE 111 TCA

- 111 TCA HAS BEEN USED FOR PARTS CLEANING SINCE 1959.

P. Flaherty 12/92

UNITS HAVE ONLY BEEN IN THIS AREA FOR APPROX. 4 YEARS; USED TO BE LOCATED IN P.F. 3, & 4 OF BLDG. 30, SINCE 1959 (TOOL ROOM USED TO BE LOCATED IN PARTS 3 & 4)

- CONTAINER STORAGE AREA - OUTDOORS, CONCRETE BASE, DRUMS ON WOODEN PALLETS FENCED IN

F005 - 1

F003/F005 - 1 -

F002 - 1, 1, 1, 1, 1

(111 TCA) WASTE OIL - 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 3, 4, 4

F001 - 1, (TCE #2), TCE - 3,

- AREA IS CURBED W/ 6" CONCRETE

- WASTE SOLDER DROSS:

6 DRUMS - SOLDER DROSS

1 DRUM - SOLDER PASTE

1 DRUM - PCB WASTE

PCB FROM LIGHT BALLAST IS [illegible] TO CALIF.

≈ 8 IN. DEEP X ≈ 20' LONG, X ≈ 10" WIDE, AREA IS ROOFED

PHOTO #18 - NE, WASTE DRUMS IN CSA (NOT INCLUDING SOLDER WASTE)

PHOTO #19 - NORTH - 7 SOLDER WASTE DRUMS IN CSA

- HAS SPRINKLER SYSTEM

PHOTO # 20 - LOCATION OF FORMER CSA - SE - FORMER CSA - 40' x 50' - WITH 2' CONC. DIKES ALL AROUND - CONC. BASE, STORED USING AT TIME CURRENT CSA WAS BUILT, ~1992 OR 1993

- NEAR PAINT BOOTH, LOCATION OF PAINT WASTE (SAA), FLOOR DRAIN NEAR UNIT HAS BEEN PLUGGED FOR ABOUT 5 YEARS

- PHOTO # 21 PAINT WASTE SAA CONTAINING F005 FLAM. PAINT WASTE, ONE 55-gal. DRUM

- PHOTO # 22 - WASTE OIL STORAGE IN BLUE HOUSE 5 55-gal DRUMS - 1 FULL, 1 PARTIALLY FULL W/ WASTE OIL, DRAIN IN AREA GOES TO SUMP, SUMP GOES TO P.F. LAUNDRY SEWAGE SYSTEM

- LOCATION OF 12 14-CUBIC YARDS ROLL-OFF BOXES THAT RELEASED F006 WASTE SOURCE IN 1990, SOIL WAS REMOVED, & SO WAS GRAVEL

- PHOTO # 23 - LOCATION OF 1 ROLL-OFF BOX DESCRIBED ABOVE

- PHOTO # 24 - CONCENTRATED WASTE TANKS - 2 CLOSEST ARE HCl, 3RD IS CAUSTIC - NaOH

- PHOTO # 25 - AREA WHERE GRATE WAS REMOVED SURROUNDING 2nd F006 ROLL-OFF BOX

P. Flaherty 1992

PHOTO #26 - SOUTH

- INACTIVE CSA, 6" DIKE, DRAINS TO CHROME SUMP TANK -

USED TO STORE CYANIDE WASTE AND ACID WASTE

CYANIDE HALF DRAINS TO CYANIDE SUMP TANK

PHOTO #27 - WEST

TANKS COLLECTING CAUSTIC + ACIDS (DAA); CHROME

PHOTO #28 -

SLUDGE (FROM CLARIFIER)

HOLDING TANK - 29,000 GAL, PHOTO SHOWS PIPES LEADING FROM CLARIFIER INTO TANK

- TRENCH NEAR HOLDING TANK PUMPS

[illegible] P. Flaherty

LIQUIDS INTO STAGE 1 OF WWT

- 2.1 CU. YD. FILTER PRESS, W/ ROLL-OFF BOX BELOW IT

PHOTO #29 - ~~20~~ P.F. 25 CUBIC YARD STEEL ROLLOFF BOX - W/ F006 WASTE FILTER CAKE TO ADAMS CENTER IN FT. WAYNE

PHOTO #30 - ROLL-OFF BOX W/ FILTER CAKE IN IT - 25 CU. YDS.

- PHOTO #31 - 1 DRUM (SAA) FOR FLAMMABLES, 1 FOR NON-FLAMMABLES (SAA) IN J38, "OIL HOUSE" NORTH

1 FLAMMABLE DRUM - F003/F005

P. Flaherty

- 1 DRUM FOR NON-FLAMMABLES
F00Z - CONCRETE FLOOR

PHOTO #31 - OUTSIDE OF J38
DOOR LEADING INTO LT -
EAST

PHOTO #32 - LOCATION OF
FORMER WASTE AMMONIA
~~E~~TCHING SOLUTION TANK - HAD
CONC. BASE + CONC. DIKE ≈ 4' HIGH
- S.W.

1545 FINISH TOUR, BACK TO MR. HOWELL'S OFF.
- PARTS CLEANERS - ONE W/
- FREON IN LT - INSTALLED IN 1981
- ONE OTHER - TAKEN OUT IN JAN 1992 -
INSTALLED IN 1975 (FREON)
- INSTALLED IN MAY 1982 OUT IN 1990 or '91
(FREON)

P. Flaherty 12/16/92

- ONE OUT APRIL - 1992 (FREON-TMS)
INSTALLED IN 1987

- ALL COLLECT ETCHING WASTES
WENT TO WWT.

1620 PRC OFF SITE.

P. Flaherty
12/16/92

SWITCHING APPARATUS, RINSE WATER GENERATED, TRI-SODIUM PHOSPHATE, TAKING BURRS OFF METAL PIECE PARTS

- ELECTROCHEMICAL GRINDING, SALT SOLUTION USED, CURRENT RUN THROUGH (2 UNITS-APPARATUS), REMOVE ARE GRINDED, WATER GOES TO WASTE TREATMENT

WASTE GENERATING PROCESS:

[A.]

(1.) - ELECTRO PLATING -

① ACID-TIN BATH (200-gal. TANK) STEEL, RUBBER LINED, RINSE WATER

~~② NICKEL-TIN BATH~~ GOES TO TWO TANKS 300-gal. TANKS

(2.)

(1.) STAINLESS?

(2.) STEEL, RUBBER COATED?

1ST RINSE TANK (300-gal.) STEEL, RUBBER LINED

2ND UNLOADER TANK, HOLDS RINSE BUCKETS, 2 BUCKETS COLLECT PARTS

- WASTE GOES TO HARD PIPE SYSTEM THAT LEADS TO WASTE TREATMENT, FROM BOTH TANKS ACID & TIN WASTE INTO WATER TREATMENT

- STARTED PROD. IN 1959 (PROP.), UNTIL APPROX. SEPT. 1992

NICKEL-CHROME PLATER

- OVAL MACHINE, AUTOMATIC, PLATING IN CAUSTIC DEP.

(109)

(110)

1ST CAUSTIC CLEAN, 2ND RINSE, ~~1ST~~ 3RD ACID, ~~2ND~~ 4TH RINSE, 3RD ACID, 4TH CLEAN, RINSE, ACID, CLEAN, RINSE → THEN PLATING NICKEL ~~OR CHROME~~ P.E →

3 RINSES → THEN CHROME PLATING

- ENDS UP IN DILUTE ACID/ ALKALI SYSTEM ↔ WASTE TREATMENT SYSTEM

- 2 RINSES : DIP & SPRAY, 3RD RINSE → INTO HOT-AIR OVEN

- CHROME TREATED DIFFERENTLY, CHROME, ITS OWN DRAIN LINE INTO WASTE WATER TREATMENT SYSTEM LARGE OPEN TANK,

- STARTED APPROX IN 1959, CURRENTLY OPERATING

P. Flaherty 11/15/92

(111)

- WASTE TREATING TO BE GONE IN 1993, ALL PLATING TO BE GONE IN 1993

- 60,000 TO 80,000 GALS./DAY WASTE WATER TREATED, SENT OUT TUMBLING & ELECTROLYSING WASTES

(3) PROGRAMMED HOIST MACHINE = PLATES COPPER, NICKEL, & ZINC

- CAUSTIC CLEANING, ACID, DICHROMATE RINSE (TO DIP ZINC IN), THEN PLATING OPERATIONS

40 TANKS TOGETHER

- Cu & Zn - CYANIDE - INTO CYANIDE SYSTEM

- Ni — GOES W/ HCl, (IT'S SOMEWHAT ACIDIC)

P. Flaherty 11/15/92

(114)

NEW CASTLE KY FACILITY -
MUC. FLAMMABLE MUC. UNFLAMMABLE
- FREON, TCE(ETHYLENE) 111-TCE(ETHANE) TO HEBRON OHIO S-K FACILITY

- HAVE 2 LARGE ROLL OFF BOXES A DAY (40 CU. YDS. EACH) FOR GEN. DEBRIS
- MOLDING SINCE 1959

C. DEGREASER - CONVEYOR IN IT, LIQUID → LIQUID + HOT VAPOR, TCE(ETHYLENE)
- OFF OF STILL - BECOMES WASTE, 5 DRUMS / 4 MONTHS
≈ SINCE MID 60S
- USED TO HAVE 4 OR 5 OF THESE UNITS

P. Flaherty 12/15/92

(115)

- 1 BULK TANK, PUMPS CLEAN TCE TO STILL, WASTE FROM STILL TO S-K (HEBRON)
- ~~1200 gals~~ P.F. 1400 gals.

D. PIECE PART CLEANING
- VAPOR ~~DEGREASER~~ P.F. CLEANER - FREON, TMS USED TO CLEAN DIRT OR SOLDER FLUX (SOLDER FLUX TAKEN OFF WHERE YOU ~~DON'T~~ WANT P.F. 12/15/92 TO SOLDER) -
- IN PART #26 (ON DIAGRAM)
- PUMP INTO DRUM ≈ 3 DRUMS / 4 MONTHS

- POSS. 2 UNITS, USED TO HAVE 6 OR 7, STORED USING WITHIN LAST YEAR + 1/2. - EACH REQUIRED AN AIR PERMIT

- PERCHLOROETHYLENE NO LONGER

P. Flaherty 12/15/92

GENERATED HERE, LAST SUMMER IN JULY, 1992, WAS USED IN ADDITIONAL (REMOVED) CLEANERS

- 2ND VAPOR ~~DEGREASER~~ CLEANER MAY USE 111 TCA, IN PART #40 ON DIAGRAM P.F.
- STORED IN 2 CSA P.F.

- OTHER CSA - FOR CLEANERS + ACIDS, OXIDIZERS, NO LONGER BY WW TREATMENT AREA (INACTIVE)
- WASTE FREON TO S-K, HERRON FACILITY
- HAND CLEANING OPERATIONS, SCRUB W/ TOOTHBRUSH P.F. 12/15/92 ~~FREON~~ INTO FLAMMABLE WASTE SOLVENT AREA SMALL CAN, TO SAA TO CSA (J38) P.F. 12/15/92

P. Flaherty 1-1-92

- E. STAMP CLEANING
- STAMPS USED TO DATE ITEMS CLEANED W/ FREON, 111; SIMILAR PROCESS TO HAND CLEANING PROCESS, NO LONGER USE FREON P.F. ~~OR~~ 111 BUTYL CARBATOL, OR BUTYL CELLOSOLVE? INSTEAD MAY BE USING 111 TO STAMP CLEAN?; MAY BE USING FREON
- APPROX. 15-20 STAMP CLEANING AREAS W/ 2gal CANS
→ WHEN FULL, GOES TO J-38 STORE ROOM, INTO NON-FLAMMABLE STORAGE (SAA)
→ SAA 2 DRUMS: 1 FLAMMABLE (ALCOHOL, MIN. SPIRITS, ETHANOL, ISOPROPYL,) 1 NON-FLAMMABLE FREON 111, BUTYL

P. Flaherty

- STARTED WHEN OPERATION STARTED 1959

F. WAVE SOLDERING:

CIRCUIT BOARD W/ FLUX ATTACHED

FLUX → SOLDERING → PERC (STOPPED ≈2 YRS. AGO)

NOW:
(NO-CLEAN FLUX)
ALCOHOL → SOLDERING →

60% TIN
40% LEAD

WASTE: DROSS, SKIMMED FROM SOLDER POT

- SOLDER USED TO BE RECYCLED, NOW SHIPPED AS HAZ. WASTE
- NOW SENDS SOLDER WASTE TO ECI?? IN CALIF.

- D008 WASTE

P. Flaherty

- JUST STARTED SHIPPING SOLDER WASTE, 1 SHIPMENT MADE IN 1991

- 6 DRUMS TO GO NOW

- ~~2~~ 1 (P.F. 12/29/92) GAL. CAN, TO ADJACENT 55-GAL. DRUM, TO CSA

- 3 SOLDERING AREAS (SOLDER POTS) (2 MOLTEN TIN LEAD & ~~+~~ 1 PLATE AREA) P.F.

- OXIDIZED TIN LEAD IS A SOLDER FLUX

G. HAND SOLDERING - DID USE FREON, NOW USE ALCOHOL (~~SOMETIMES~~ P.F. DON'T NEED TO CLEAN JUST FLUX THEN SOLDER)

P. Flaherty 1/5/92

P.F. 12/15/92 WERE USED

- WHEN WASTE FREON, + 111, TRANSFERRED FROM 1 2 GAL CANS TO J-138 (P.F. 12/15/92)

FREON UNTIL ~1990, 12/15/92 P.F. ~~THEN 111~~; GOTTEN RID OF 111 IN THIS YEAR

- P.F. 12/15/92 WAVE SOLDERING OPERATION STARTED 15 YEARS AGO

- HAND SOLDERING SINCE BEGINNING, ~1959

H. TOOLROOM - MILLING MACHINES, GRINDERS ARE CLEANED

- TANK DEGREASER - 12 gal. STEEL, CLEAN. IN TANK, PUMPED CLEAN INTO DRUM

- PUMP FROM TANK INTO 55 gal. DRUM

P. Flaherty

- 111 IS IN TANK

- SINCE BEGINNING: 1959

- KEEP 1 DRUM ADJ. TO TANK; ~ 1 DRUM EVERY 4 MONTHS

- WILL REPLACE W/ BUTYL

I. - POWER HOUSE

- GENERATE STEAM (2), HEATING HEAT, FOR HOT WATER, FOR CLEANING

- AIR COMPRESSORS GENERATE OIL

- 111 USED TO CLEAN COMPONENTS ON CHILLER FOR AIR CONDITIONING

P. Flaherty 1.1992

- Waste Oil gen. ~2 Drums/6 mos.
- Goes to S-K
- 111 TCA only Gen. twice since 1970 (for cleaning of AC)
- Waste Oil Gen. since Op. began - 1959; stored in CSA (55-gal Drums)
  - Sometimes 1 55-gal Drum in the area for waste oil Accum.
- Water in Power House supplied by City - All water is supplied by City
- 3 Cooling towers: 2 cell, 3 cell - both for Refrig. Units for A/C
  4 cell - Process water used to cool Molding Machines
- Blowdown from Cooling towers goes to City of Columbus Storm Sewer
- Do have NPDES Permit for Discharges from Drinking fountain + 5 AC units; ~~Goes~~ went to Storm water; 3 into Closed Loop System, Now - 2 Discharge into Storm
- Facility Storm Water Goes out into pond, into Storm into Big Walnut Creek
- Monitor once/month; Flow monitoring at 2 locations → Report pH to State ~~& Doherty~~

- ONLY HAVE 2 NPDES PERMITS

J. MAINTENANCE PAINT BOOTH
- PAINTING OF MISC. ITEMS; DESKS, CABINETS, ETC.
- TOLUENE USED AS THINNER
- GOES AS FLAMMABLE HAZ. WASTE - USE SOLVENT-BASED PAINTS

- 1 55-gal DRUM (SAA) GOES TO WASTE PAD (CSA)

- ≈1 DRUM / 2 MONTHS

- SINCE OPERATIONS BEGAN - 1959, ≈10' x 8' BOOTH, HAS EXHAUST SYSTEM

P. Flaherty 1-1-92

- 96 AIR PERMITS

K. WASTE TREATMENT FACILITY
COMES IN
1. DILUTE ACID & ALKALINE (1 TANK)
2. CHROME (1 TANK)
→ ADD SULFUR DIOXIDE TO, & TREAT HEXAVALENT TO TRIVALENT
3. CYANIDE WASTE TREAT W/ CHLORINE TO BREAK DOWN TO CO_2, W/ N, DESTROY

3 → 1 2 → 1,
ADD MAGNESIUM OXIDE, (MAGNAFLOC) CHROMIUM HYDROXIDE, ZINC HYDROXIDE (ALL HEAVY METALS): 4 TANKS BEFORE CLARIFIER
- ADD POLYMER TO IT, TO PRECIPITATE IN CLARIFIER, WHERE WATER IS EMPTIED TO HOLDING TANK

P. Flaherty 1.1.1.92

(126)

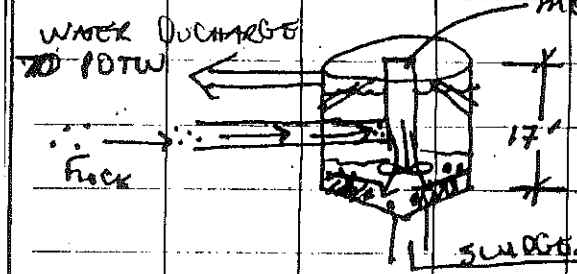
*1 - CATIONIC POLYMER (TONNAGE) 1ST TANK TPH

*2 - JUST MIX IT UP 2ND TANK

*3 - " " MONITOR 3RD TANK

*4 - ADD ANIONIC POLYMER, NaOH 4TH, pH from 9 to 10

→ THEN INTO CLARIFIER, SLUDGE SETTLES OUT



- SLUDGE ACCUMULATES ON BOTTOM, ≈EVERY 15 MIN, PULL SLUDGE INTO HOLDING TANK - 20,000 GAL CONCRETE, WITH AIR AGITATION TANK

- WHEN 7' IN HOLDING TANK, HYDRAULIC FILTER PRESS; COMES OUT ≈50% H_2O 50% HEAVY METAL SLUDGE

P Flaherty

(127)

- PUMP, AFTER 7' HIGH TO FILTER PRESS ON 2nd FLOOR

- WATER FROM FILTER PRESS GOES BACK TO STAGE *4

- ALL TANKS EXCEPT CHROME ARE CONC. W/ PVC LINING

- UNDER PRESS, 20 OR 25 CUBIC YARD BOX, STEEL, ROLL-OFF FOR ≈12.5 TONS/SLUDGE

- 1 BOX (12.5 TONS) / MONTH

- CHEM. WASTE MANA. PICKS UP, OUT OF DAYTON, TO LANDFILL IN FT. WAYNE IN

- ≈75,000 gpd

- CHROME TANK IS CONC. W/ ACID BRICK INSIDE

- CLARIFIER ADDED IN 1971

P. Flaherty 101

- 1 CLARIFIER - 90,000 NOT IN USE
- CLARIFIER IN USE IS 140,000 GALLONS
- PLATING TANKS NOT DUMPED INTO WWT SYSTEM (ROUTINELY)
- CLEAN PLATING TANKS (ALL) ONCE / YEAR
- CHROME WASTE FROM TANKS 1 DRUM / YEAR
- ZINC WASTE - 2 DRUMS / YEAR
- COPPER DOES NOT SLUDGE OUT
- ZINC & COPPER FILTERED CONTINUOUSLY IN OPERATION

P. Flaherty 1-192

- FILTERS FROM TANKS, 2 TIMES / YEAR, 3-4 DRUMS / YEAR, HERITAGE IN TROY
- PITS UNDER TANKS FOR "CRUD", i.e. SODIUM HYDROXIDE RESIDUE (CAUSTIC TANKS)
- ALL TANKS HAVE PITS, W/ AUTOMATIC PUMPING SYSTEMS TO PUMP TO WWT, IF SPILL OCCURS
- "CRUD" CLEANED FROM PITS ONCE / YEAR
- DURING SHUTDOWN (2 WEEKS IN AUG. / SEPT.) DO CLEAN-UP OF PITS & TANKS, HERITAGE TAKE WASTE

P. Flaherty 1-192

1440 BREAK FOR LUNCH

1545 RETURN TO FACILITY TO CONTINUE INSPECTION

- WASTES GEN BY AT T BELL LAB. IS HANDLED BY AT T
  - CHEMICAL LABS CLEANED IN 1990, BY CHEM WASTE MANAGEMENT
- i.e. PLATING CHEMICALS, WASTE ACIDS, ~~KEAT~~ P.F. WENT TO WASTE WATER TREATMENT ~~FAC~~ P.F. UNIT
  - ~~NOT SURE WHEN THIS STARTED~~ P.F. 12/5/92
- METALLURGICAL, ALLOYS PLASTICS ETC. - LAB BEGAN IN 1959
- FOR 2 MONTHS IN 1990, COULD NOT PUMP SLUDGE FROM CLARIFIER, STORED IN ROLL OFF BOXES NEXT WWT - RELEASE OF FAB SLUDGE TO SOIL.

D Flaherty

- SOIL REMOVED OEPA OVERSAW TIRE CLEANUP
- NO OTHER SPILLS OR RELEASES FROM THE FACILITY
- NEVER HAD USTS, NONE NOW — WASTE P.F. 12/15/92
- DID HAVE 2 NO. 2 FUEL OIL USTS, REMOVED IN 1988 12,000-gal & 3,000 gal.
- DID HAVE 1 UNLEADED/1 LEADED GAS USTS - YANKED IN 1986 - OEPA NOT HERE; NO SAMPLING → NO LEAKS
- 2 375,000 - ABOVEGROUND TANKS HAD CLAY DIKE INSTALLED

P. Flaherty 1-19-93

- DURING ON SITE PERIOD, STATE DID REQUIRE ≈ 3 DUMP TRUCK LOADS ≈ 40 cu. YDS. OF SOIL TO BE REMOVED

- AMMONIA ETCHING SOLUTION 2 TANKS - INDIOS : 1 WASTE, 1 VIRGIN, FOLD; ~~COPPER USED~~ P.F. IN PRINTED WIRING BOARDS MANUFACT. PROD. STOPPED USING IN 1986, WHEN GOLD & COPPER ETCHING OPERATIONS STOPPED

- FIBERGLASS TANKS, 8,000-9gl. 1980 - 1986, IN CONC. DIKED AREA; REMOVED

- TOTAL FENCE AROUND PREMISES, 24 HOURS SECURITY

P. Flaherty -192

- BEDFORD LANDFILL, NOW CLOSED, TO NORTH

- CEMETERY FOREST LAWN - TO WEST

- EAST - INDUSTRIAL COMPLEX, WAREHOUSING OPERATIONS MANY, CAN MANUFACTURING COMPANY

- NE - COMMON STEEL DRUMS - RECYCLED DRUMS

- SOUTH, PLAZA, MOUNT CARMEL MEDICAL COMPLEX

- NEAREST RESIDENCES NEAR PLAZA, TO SOUTH ≈ 1/4 MI.; RESIDENCES ON ~~US~~ P.F. CUT + FOR WITHIN

(134)

3 MILES OF HOPE, RESOURCE MAY USE ~~G~~ P.F. WELL WATER

- ~~10~~ P.F. 12/15/92 ON-SITE WELLS; DO HAVE ON-SITE MONITORING WELLS, 8 TOTAL, ALONG EAST SIDE ~~OF BLDG~~ P.F. 12/15/92, SAMPLE TWICE A ~~YEAR~~

- BEDROCK ≈ 18', WATER (GW) AT DEPTH OF APPROX. 10',

- PRIOR TO ~~1986~~ 1985 P.F. 12/15/92 STORED WASTE IN CONC. CURBED AREA, NEAR BLDG. 46

- ORIG. PAD ≈ 30' x 40'? CONC. FLOOR, 1'1/2-2' DIKE, OUTDOORS

P. Flaherty '92

(135)

- PROD. STARTED AT BEGINNING IN 1959

- CYANIDE WASTE, CHROME + ACID, } BOTH ENCLOSED BY 6" CURB
- SINCE PROD. 1959
- NOT USED FOR 7 OR 8 YEARS

- DRAIN INTO CHROME SURGE TANK OR CYANIDE TANK, IF THERE IS A RELEASE IN EITHER OF THE 2 AREAS W/ 6" CURBING

- 2 CSAs CLOSED IN 1982:
  - ORIG. AREA NOW UNDER BLDG 35
  - AREA(S) W/ 6" CURBING (STILL IN EXIST.)

P. Flaherty

(136)

- FREON NO LONGER USED IN OPERATIONS, EXCEPT:...
  1 VAPOR DEGREASER, POTENTIALLY WILL USE FREON, IF NEW MATERIAL DOES NOT WORK ADEQUATELY
  TCA 111 STILL USED...
- TCA 111 IN TOOL ROOM,
- TCA 111 IN VAPOR CLEANER (USED TO BE FREON)

(- TCE DEGREASER IS 1,400-gal.)

1735 PRC OFF SITE

P. Flaherty 12/15/92

WED. DEC. 16TH, 1992 (137)

MILD, ≈45°F

0900 P. FLAHERTY & K. KRUK RETURN TO AT&T, MEET WITH DALE HOWELL

- VAPOR CLEANERS USED FREON, VAPOR CLEANERS THAT ARE NOW REMOVED, HAD THEIR OWN ADJACENT 55-gal. DRUMS (SAA)

P.F. 12/15/92

- 1 VAPOR ~~CLEANER~~ DEGREASER (IDLE NOW), BUT HAS FREON IN IT

- OTHER VAPOR DEGREASER HAS BUTYL (NEW ~~PRODUCT~~ CLEANER IN IT)

P.F. 12/16/92

- TCE DEGREASER HAS ITS OWN SAA ADJ. TO IT

- HAND CLEANING - JUST USING ALCOHOL

P Flaherty

- F003 & F005 WASTES ~~ARE~~ P.F. ARE ALCOHOL WASTES, ~~FROM WAVE SOLDERING~~ P.F. 12/28/92 ... O.K. P.F. 01/04/93 & HAND CLEANING OPERATION
- NO ALCOHOL WASTE FROM WAVE SOLDERING?

- WASTE OIL IN MOLDING AREA - SAA

- TCA VAPOR DEGREASER SOMETIMES HAS ITS OWN ADJACENT SAA, WASTE DOES NOT GO TO J38
- STAMP CLEANING SWITCHING FROM TCA 111 TO BUTYL CARBITOL STAMP CLEANING
- MARKEM 320 WAS USED PRIOR TO 111 → 111 BECAME BEING USED WITHIN THE LAST TEN MONTHS
- ~~++~~ P.F. BUTYL PRODUCT WILL NOT DRY

P. Flaherty

- SOCK DRUM IS WASTE OF OPERATING SYSTEM

- MARKEM 320 CLEANER IS COMPOSED OF ISOPROPYL ALCOHOL AND ETHYL ACETATE

- BUTYL CELLOSOLVE - ETHYLENE GLYCOL MONOBUTYL ETHER

- BUTYL "CARBITOL" - DIETHYLENE GLYCOL MONOBUTYL ETHER

- 111 IS NON-FLAMMABLE, SO IS BUTYL CELLOSOLVE & BUTYL CARBITOL

- COPPER ETCHING TANK PUMPED DIRECTLY INTO WASTE AMMONIA

P. Flaherty

(140)

ETCHING SOLUTION TANK (ANTIC TANK WAS REMOVED IN ≈ 1986)

- APPROX. GEN 5 DRUMS/MONTH OF WASTE OIL

- DEGREASERS THAT HAVE BEEN REMOVED: 2 OF THEM REMOVED, BOTH INSTALLED IN 1972, BOTH USED TCE, NO NOTE OF REMOVAL DATE; HE GUESS 1 OUT 3 YEARS AGO ≈1989 OR 1990, OTHER OUT ≈ 15-17 YEARS AGO
- ~~4 OR~~ P.F. 5 OR VAPOR CLEANERS WERE REMOVED, IN 1990 OR 1991, ALL USED FREON

- 111 ONLY IN 2 OPERATION NOW

- DON'T USE BUTYL CELLOSOLVE IN Flaherty 1192

1030

THIS FACILITY ANY LONGER? (CLEANER, DEGREASER).

- GOLD PLATING, COPPER ETCHING OPERATIONS TOOK PLACE FROM 19??

BEGIN FACILITY TOUR

PHOTO #1 = WEST, WAVE SOLDER SAA, 1 gal. BUCKET, STEEL?

PHOTO #2 - N.W. - SAME AS ABOVE PCB LOCATION ON "OLEANDOMATIC" DRUM

PHOTO #3 LOCATION OF SOLDER PASTE (SAA) - SOUTH IN CELLULAR AREA

PHOTO #4 - DOREX DRUMS 55-gal. Flaherty

ATTACHMENT C
VISUAL SITE INSPECTION FIELD NOTES

- GRAPHITE, KEVLAR, FIBERGLASS USED TO IMPREGNATE MATERIALS
- WASTE OIL NOT NORMALLY GENERATED - ONCE IN 6 YEARS, WASTE OIL FROM AIR COMPRESSOR

1305 - BACK FOR WRAP-UP MEETING

1330 PRC OFF SITE

HEXCEL

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TUESDAY, DEC. 15, 1992

PT. CLOUDY, COOL, ≈40°F

0820 PRC ARRIVES AT AT&T, P. FLAHERTY & K. KRUK MET WITH DALE HOWELL & BARBARA THOMSON OF AT&T

- MANUFACTURES SWITCHES & APPARATUS USED BY AT&T, COMPUTERIZED SYSTEMS, CIRCUIT BOARDS

- PLATING WILL BE GOING IN 1993 P.F. 12/15/92 ~~1985~~, - (FOR "OLD" APPARATUS)

- BELL LABS IS SOFTWARE DEVELOPMENT - COMPUTERIZED SOFTWARE, SEPARATE ENTITY, BELL LABS GETS THEIR MONEY FROM

P. Flaherty 12/15/92

(104)

AT ; T

- 3 SYSTEMS
  SWITCHING SYSTEMS - PLATING, PIECE PART FABRICATION, MOLDING, & DEGREASER
- BELL LABS USED TO HAVE A PLATING FACILITY UNTIL 1990
- CHEM WASTE WAS HIRED TO MOVE BELL LAB OUT
- DID MAKE OWN CIRCUIT BOARDS W/ GOLD PLATING UNTIL ≈ 1986, DO NOT MAKE ANY CIRCUIT BOARDS
  TYPES OF PLATING:
  ① ACID-TIN BATH, ② AMID. NICKEL-

P Flaherty 1992

(105)

③ CHROME PLATER, HOIST MACHINE PLATES COPPER, NICKEL AND ZINC

- USED TO DO GOLD PLATING, COPPER ETCHING, ALUMINUM ETCHING
  UNTIL ↓ ≈ 1986 UNTIL ↓ ≈ 1983
- PROB. STARTED IN 1965
- BEGAN OPERATIONS IN 1959
  WAS WESTERN ELECTRIC,
  IN 1982, GOV'T. REQUIRED WEST. ELECTRIC TO SPLIT UP
  → AT ; T NETWORK SYSTEMS, BECAME
  → AT ; T ABOUT 3 YEARS AGO
- "WESTERN ELECTRIC" IS TRADE MARK OF AT ; T
- OPERATIONS WERE THE SAME FROM WEST. ELEC TO AT ; T

P Flaherty 12/15/92

- BELL TELEPHONE LABORATORY CAME IN 1959

- 6200 EMPLOYEES (W/ BELL LABS INCLUDED)

- PRODUCTION – (NON WASTE GENERATING)

- CABLE FORMING: MAKING WIRE HARNESSES, TO CONNECT WIRES IN SWITCH CABLE

- WIRING; W/ BLUEPRINT CONNECT WIRES

- TESTING: TESTING RELAYS, RUN ELECTRIC CURRENT THROUGH RELAYS, → RELAYS COMPRISE A SWITCH

D. F. Doherty
11/15/96

- METAL PIECE PART FABRICATION PUNCH PRESS → GENERATES SCRAP METAL, GOES TO LOCAL SMELTER i.e. MASSER ~~RE~~ T.J. METALS, PLAIN COLD-ROLLED STEEL SCHLUNGER (SLUGS FROM PUNCH PRESS)

- PRINTED WIRING BOARD INSERTION: MACHINE THAT PUTS RESISTORS + SUCH, DIODES ONTO CIRCUIT BOARD

- TEST SET CONSTRUCTION: MAKE CABINET, PROGRAMMED CABINET TO TEST SWITCHES THAT FACILITY (AT&T) SELL TO THEM

- TUMBLING (METAL PARTS) – OLD

D. Doherty

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:
HRE-8J

December 7, 1992

Mr. Dale Howell
AT&T Columbus Works
Department 016200
6200 E. Broad Street
Columbus, Ohio 43213

Re: Visual Site Inspection
AT&T Columbus Works
6200 E. Broad Street
Columbus, Ohio
ID No. OHD 004 282 703

Dear Mr. Howell:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

The VSI has been scheduled for December 15, 1992 at 9:00 a.m. The inspection team will consist of Margaret Flaherty and Kristine Kruk of PRC Environmental Management, Inc., a contractor for the U.S. EPA. Representatives of the Ohio Environmental Protection Agency may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,

Francene D. Harris for

Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

Enclosure

cc: Ed Lim - Central Office, OEPA
Brad Campbell - Central District Office, OEPA

ATTACHMENT I

The definitions of SWMU and AOC are defined as follows:

A SWMU is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells.
- Closed and abandoned units.
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units.
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents, such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas.

An AOC is defined as any area where a release to the environment of hazardous wastes or constituents has occurred or is suspected to have occurred on a nonroutine or non-systematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

PRC is requesting that the following facility information be provided at the visual site inspection:

1. Two copies of a detailed map of the facility
2. Facility history, including dates of operation, ownership changes, and production processes
3. Current facility operations
4. Processes that generate waste materials that are treated, stored or disposed of at the facility
5. Records of disposal of wastes generated at the facility (manifests, annual reports, etc...)
6. Security at the facility
7. Information regarding geology and the uses of ground water and surface water in the area
8. Permits (i.e. air, NPDES, etc...) the facility currently holds or has held in the past and documentation of any permit violations that may have occurred
9. Records of any spills that may have occurred at the facility
10. Descriptive operational information (location, dimensions, capacity, materials of construction, etc...), dates of start-up and closure, wastes managed, release controls, and release history for each SWMU